

Please note: This English version is a convenience translation – the German version shall prevail

Technical guidelines

DECLARATION OF COMPLETENESS

I. Document version history

CHANGE HISTORY			
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3 May 2019	1.1	Screenshots of figures 2, 5 and 6 exchanged due to new releases, additions to chapter 6.3 (first paragraph)	Stiftung Zentrale Stelle Verpackungsregister
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20 January 2022	2.2	Chapter 6 ('Declaration of completeness submission by an authorised representative') added	Stiftung Zentrale Stelle Verpackungsregister
10 November 2022	2.3	Updated with current screenshots and images from the LUCID packaging register	Stiftung Zentrale Stelle Verpackungsregister
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Table of contents

1	General information on the declaration of completeness	4
2	Process of generating a declaration of completeness in LUCID	4
3	Terminology	5
4	Information to be recorded by the producer for the declaration of completeness	5
4.1	Recording general data for the declaration of completeness	5
4.2	Recording packaging subject to system participation	10
4.3	Recording the volumes for sector-specific solutions	14
4.4	Packaging: non-private final consumer (section 11 (2) no. 2 VerpackG)	16
4.5	Submitting the declaration of completeness	18
4.6	File declaration of completeness	20
4.7	Correcting the declaration of completeness after generating the producer declaration	23
5	Declaration of completeness submission by an appointed third party	24
5.1	Manage declaration of completeness	24
5.2	Create/edit a producer's DoC	27
5.3	Overview of 'appointed third party' declaration of completeness dialogue	27
6	Declaration of completeness submission by an authorised representative	28
6.1	Manage producers	29
6.2	Filing a declaration of completeness	30
7	Uploading audit documents	31
7.1	Navigating to the declaration of completeness for auditors screen	31
7.2	Navigating to the declaration of completeness for producers / appointed third parties screen	33
7.3	Uploading the producer declaration	35
7.4	Uploading the audit confirmation	36
7.5	Uploading the audit report	37
7.6	Submitting the audit result	37
7.7	Resetting after the audit result has been submitted	39
8	Document requirements	40
9	Publication in the public register	42
10	Qualified electronic signature	42
10.1	General information on the qualified electronic signature (QES)	42
10.2	Auditing the QES in LUCID	42
10.3	Information about signing documents with a QES	43
11	Table of figures	44

1 General information on the declaration of completeness

These technical guidelines describe the process for submitting the declaration of completeness (DoC) under section 11¹ VerpackG. The entire process is looked at from a technical perspective so that the document is targeted towards both producers, appointed third parties and DoC auditors within the meaning of section 11 (1), section 27 (1), (2) VerpackG.

The audit of the DoC content is based on the relevant audit guidelines, which can also be accessed on the Packaging Register's website.

Pursuant to section 11 (1) VerpackG, a producer is required to file a DoC with the Stiftung Zentrale Stelle Verpackungsregister (Foundation Central Agency Packaging Register – ZSVR) if the thresholds set out in section 11 (4) VerpackG are reached (glass \geq 80,000 kg, PPC \geq 50,000 kg or Ferrous metals + aluminium + plastics + beverage cartons + other composites (lightweight packaging) in total \geq 30,000 kg). Where the volume thresholds have been exceeded, the DoC must be submitted by 15 May of each year, covering all the packaging subject to system participation placed on the German market for the first time in the previous year. If a producer files a DoC because they were ordered to do so by the ZSVR or a responsible state authority (section 11 (4) VerpackG), the deadline will be set out in the respective order. If the filing is voluntary, there is no set deadline for submission.

The DoC can be submitted in LUCID in German and English.

2 Process of generating a declaration of completeness in LUCID

Filing an audited DoC in LUCID comprises the following steps:

- Step 1. Recording general data for the declaration of completeness (chapter 4.1)
- Step 2. Recording volumes (chapter 4.2 to chapter 4.4)
- Step 3a. DoC submission by producer (chapter 4.5 and chapter 4.6)
- Step 3b. Step 3b. DoC submission by appointed third party (chapter 5)
- Step 3c. Step 3b. DoC submission by authorised representative (chapter 6)
- Step 4. Uploading the producer declaration (chapter 7.3)
- Step 5. Uploading the audit confirmation (chapter 7.4)
- Step 6. Step 6. Uploading the audit report (chapter 7.5)
- Step 7. Submitting the audit result (chapter 7.6)

Steps 1 to 3c must be carried out by the producer / authorised representative / appointed third party. Steps 4 to 7 can either be done by the producer / authorised representative / appointed third party or by the auditor.

Chapter 7.7 contains information about correcting audit results.

The chapter 7 sub-chapters contain information about the requirements for uploading documents, as well as information about DoC publication in the public register, together with information about qualified electronic signatures (QES).

¹ Unless indicated otherwise, section references to an Act are to the Verpackungsgesetz (Packaging Act – VerpackG).

In accordance with section 33 VerpackG, the DoC entries can also be filed by an appointed third-party for a producer. A dedicated module is contained in LUCID for this purpose (cf. chapter 5).

3 Terminology

The declaration of completeness (**hereinafter referred to as 'DoC'**) must be audited and confirmed by a registered expert pursuant to section 27 (1) in conjunction with section 3 (15) VerpackG, or by a registered auditor, tax advisor or sworn accountant pursuant to section 27 (2) VerpackG. This circle of auditors (**hereinafter referred to as 'auditors'**) is registered via the ZSVR's internet portal, LUCID.

To file a DoC, registration pursuant to section 9 VerpackG is required for producers, and registration pursuant to section 27 VerpackG is required for auditors. A DoC is always filed in reference to an individual registration number. A consolidated/aggregated submission for multiple registration numbers is not permitted. Where a producer tasks an **appointed third party** with the filing requirement, the third party must apply for their own login with the ZSVR.²

The user must ensure that the data and documents filed in connection with the DoC are complete and up-to-date, and that the basis of the underlying information can be fully verified and is fully documented. The guidelines for auditing DoCs provide the auditor with a framework for their activities beyond the legal and professional regulatory requirements. A user who submits a DoC in LUCID may be a producer, authorised representative or appointed third party, in accordance with the process described in chapter 2.

The volumes that need to be reported in relation to the DoC and the corresponding documentation can only be filed manually. Details on the process for filing data in LUCID and on the technical requirements for submitting the declaration of completeness to the ZSVR will be described further in the following sub-chapters.

Pursuant to section 11 (3) VerpackG, the auditor within the meaning of section 11 (1) VerpackG must provide the DoC confirmation with a qualified electronic signature (cf. also chapter 10 'Qualified electronic signature'). The validity of the signed documents will be verified.

4 Information to be recorded by the producer for the declaration of completeness

4.1 Recording general data for the declaration of completeness

The general data for the DoC must absolutely be recorded by the producer / authorised representative / appointed third party. Access is gained via a personalised login. Producers receive their login as part of registration, while authorised representatives and appointed third parties receive a login by generating one in LUCID. After a producer logs onto LUCID,³ the dashboard below is displayed.

² Requirement pursuant to section 11 (3) VerpackG.

³ The appointed third party's dashboard is contained in chapter 5. The dashboard for authorised representatives is contained in chapter 6.

LUCID Dashboard

Welcome to your LUCID Dashboard.

Registration number	XXXXXXXXXX	Last login:	31.08.2022
Company name	Hersteller	Registration date:	17.03.2022
Registration status:	Registered	Last profile update:	01.09.2022
Last volume report:	17.08.2022		
Type of last volume report:	Intra-year volume report		

Master data

Edit master data, change login, close registration

[Edit >](#)

Details about the packaging

Edit details about your company's packaging

[Edit >](#)

Brand names

Edit brand names

[Edit >](#)

Data report

Submit data report

[Edit >](#)

Declaration of completeness

Edit declaration of completeness

[Edit >](#)

Documents

Download documents

[Download >](#)

Figure 1 – LUCID, producer dashboard, overview of all tiles

Click on the 'Edit' button in the 'Declaration of completeness' tile. Then the selection below will open.

Declaration of completeness

You can submit a new declaration of completeness (DoC) here, or continue one you have already started. You can amend existing declarations of completeness. If the de minimis threshold set out in section 11 (4) VerpackG (Packaging Act) is exceeded (glass > = 80,000 kg, PPC (paper, paperboard and cardboard) > = 50,000 kg or the total of the other materials named in section 16 (2) VerpackG > = 30,000 kg), producers are required to file a declaration of completeness by 15 May of each year. Regardless of the de minimis threshold, the Zentrale Stelle (Central Agency) or the responsible state authority has the power to order that a declaration of completeness be filed by a certain date. Producers can also voluntarily submit their declaration of completeness here at any time.

Declaration of completeness according to VerpackG

Filing of the declaration of completeness according to VerpackG (from reference year 2019)

[Edit >](#)

Declaration of completeness according to VerpackV

Filing of the declaration of completeness according to VerpackV (up to reference year 2018)

[Edit >](#)

Submission of DoC by appointed third party

Edit submission of DoC by a appointed third party

[Edit >](#)

Figure 2 – Selection of the DoC type

For reference years from 2012 up to and including 2018, the DoC must be filed according to the Verpackungsverordnung (Packaging Ordinance – VerpackV) ('Declaration of completeness according to VerpackV'). From the 2019 reference year onwards, the DoC must be filed according to the Verpackungsgesetz (Packaging Act) ('Declaration of completeness according to VerpackG'). Click on the 'Edit' button to select the type. This will prompt the following screen to open:

Declaration of completeness according to VerpackG

You can submit a new declaration of completeness (DoC) according to VerpackG (from reference year 2019) here (click on „add declaration“), or continue one you have already started (click on „edit“). You can amend existing declarations of completeness (click on „correct“). A declaration of completeness can only ever be submitted for the previous calendar year (reference year). It is not possible to file one during the current calendar year. The information must be reviewed and verified by a registered auditor. Only then is the declaration of completeness filed in accordance with § 11 (1) VerpackG. You can use LUCID to find registered auditors in the Zentrale Stelle's (Central Agency's) register of auditors. The Zentrale Stelle is under statutory obligation to publish a list of producers who have filed a declaration of completeness; this list is published in the public register on the Zentrale Stelle's website. Publication starts on the 16 May for the previous reference year. The list is updated on a regular basis.

Reference year	Status	DoC reason	Actions
2021	Started	Duty triggered by exceeding thresholds	Edit

1 - 1 of 1 items

[Add declaration](#)

Figure 3 – DoC tile, overview of DoCs

If an existing DoC needs to be edited, click on the appropriate 'Edit' button.

To submit a new DoC, click on the 'Add declaration' button. The screen 'General declaration of completeness information' displayed below will then open.

General declaration of completeness information

To start, edit or correct a declaration of completeness, please begin by entering the general information requested here. Your registration number, company name and the reference year (except when the „add declaration“ function has been selected) are already filled in.

General declaration of completeness information

Registration number *
[Redacted]

Name (company name) *
Hersteller

Reference year *
2021

DoC reason *
[Dropdown]

Type of packaging *
Packaging

Auditor *
[Input field]

Declaration of consent (optional): I hereby consent to the registered auditor I have indicated here being supplied with the data and documents to audit my declaration of completeness for the selected reference year directly via LUCID.

Figure 4 – Setting up a new DoC ('Add declaration')

The 'Registration number' and 'Name (company name)' fields are automatically filled in with the producer's master data and cannot be changed.

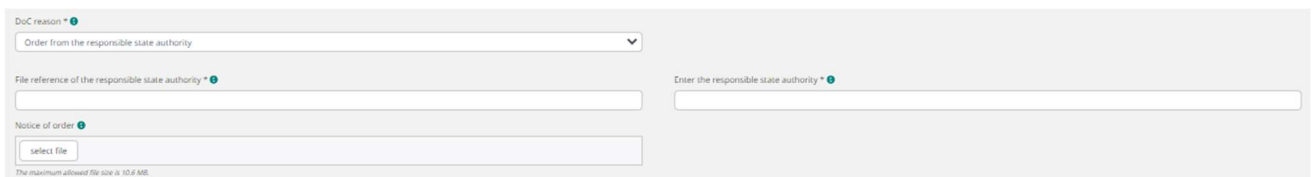
In the 'Reference year' field, select the year for which the DoC is being submitted. It is not possible to file a DoC if the reference year is ongoing. If the DoC reason is 'Duty triggered by exceeding thresholds', the filing occurs in the following year for the reference year immediately prior. It is possible to file a DoC retrospectively back to 2012 (only via the 'Declaration of completeness according to VerpackV' tile).

A DoC can be submitted with a variety of 'DoC [references/reason]' for a reference year, but only one DoC can be filed per reference year and DoC [reference/reason]. This would be necessary, for example, if an audit of a DoC that was submitted under the DoC [reference/reason] of 'Duty triggered by exceeding thresholds' or 'Voluntary' reveals inconsistencies that result in an order from the ZSVR or state enforcement authorities. In these cases, a completely independent and therefore new DoC needs to be submitted.

In the 'DoC reason' field, the reason for the DoC must be recorded. As a general rule, the selection '*Duty triggered by exceeding thresholds*' should be selected if the producer has exceeded the thresholds defined in section 11 (4) VerpackG during the reference year indicated (glass \geq 80,000 kg, PPC \geq 50,000 kg or the sum of the other materials named in section 16 (2) VerpackG) \geq 30,000 kg). Where the volume thresholds have been exceeded, the DoC must be submitted by 15 May of each year, covering all the packaging subject to system participation placed on the German market for the first time in the previous year.

If the reason for the DoC is 'Requirement from the ZSVR' or 'Requirement from the responsible state authority', the ZSVR or the state authority will set out the deadline for submission on an individual basis in an administrative act. If the reason 'Other/optional' is selected, no deadline can be given. The provision under section 11 (1) VerpackG can be used as a reference guide.

When 'Requirement from the responsible state authority' is selected as the [reference/reason], the fields displayed in the screenshot below, 'File reference of the responsible state authority' and 'Enter the responsible state authority' must be filled in.



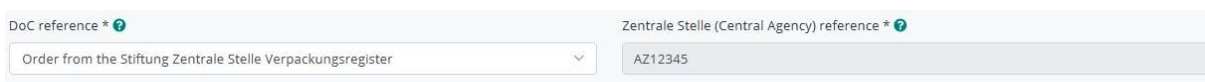
The screenshot shows a form with the following fields:

- DoC reason ***: A dropdown menu with the selected option "Order from the responsible state authority".
- File reference of the responsible state authority ***: An empty text input field.
- Enter the responsible state authority ***: An empty text input field.
- Notice of order**: A button labeled "select file".

The maximum allowed file size is 10.0 MB.

Figure 5 – Fields to be updated when DoC [reference/reason] is 'Requirement from the responsible state authority'

If a DoC is filed due to an order by the ZSVR, the DoC reason 'Order from the Stiftung Zentrale Stelle Verpackungsregister' and the ZSVR reference are already preset after clicking on the 'Add declaration' button (cf. 'Figure 3 – DoC tile, overview of DoCs').



The screenshot shows a form with the following fields:

- DoC reference ***: A dropdown menu with the selected option "Order from the Stiftung Zentrale Stelle Verpackungsregister".
- Zentrale Stelle (Central Agency) reference ***: A text input field containing the value "AZ12345".

Figure 6 – Fields when DoC reason is 'Order from the Stiftung Zentrale Stelle Verpackungsregister'

The field 'Type of packaging' is preset to the entry 'Packaging' and cannot be changed.

In the field 'Auditor', the name of the expert/auditor whom the producer has instructed to perform the audit and confirm the DoC must be entered. The expert/auditor must be registered pursuant to section 27 VerpackG in the ZSVR's register of auditors, in LUCID. After the fourth character of the auditor's name or the fourth digit of the auditor's ID is entered, the registered auditor will be suggested. It is not possible to search for an auditor organisation / company name here (it is possible to do so in the Packaging Register LUCID's public register).

The DoC must be audited and confirmed by one of the auditors registered with the ZSVR (section 27 (1), (2) VerpackG). The producer / authorised representative / appointed third party can decide directly in LUCID that the responsible auditor will be provided with the producer declaration directly within LUCID. This can be done by checking the 'Declaration of consent' box. This decision can be

changed at any time (including while the filing process is ongoing). The producer / authorised representative / appointed third party and – where the producer / authorised representative / appointed third party has provided consent – the auditor as well, can use a link to download the producer declaration created in LUCID after volumes have been entered. Here it should be noted that it can take a few minutes to generate this document for technical reasons. In addition, producers / authorised representatives / appointed third parties, including auditors where consent has been provided, will receive an e-mail with a corresponding link. If no declaration of consent has been provided, the producer / authorised representative / appointed third party must provide the auditor with the producer declaration outside of LUCID.

After the data in the 'General declaration of completeness information' screen have been saved, the 'Declaration of completeness' screen will then open. From this point, the rest of the entries can be made. Data entry is structured in a modular way, i.e. you can limit your filing of reports to those DoC modules that are relevant for the user. Modules not relevant for an individual case do not need to be edited.

Declaration of completeness

To create your declaration of completeness according to VerpackKG (from reference year 2019), please enter the relevant data. To conclude, you can check and submit it under "Declaration of completeness submission". Click „Explanation“ to learn more about a particular point.

Company name: **Hersteller** Registration number: [REDACTED] Reference year: **2021**

General declaration of completeness information

Edit general information

[Edit](#) [Explanation](#)

Packaging subject to system participation

Packaging volumes subject to system participation per system operator

[Edit](#) [Explanation](#)

Sector-specific solution volumes

Packaging volumes taken back per sector-specific solution

[Edit](#) [Explanation](#)

Packaging - non-private final consumer

Packaging according to section 11 (2) sentence 1 No. 2 VerpackKG

[Edit](#) [Explanation](#)

Declaration of completeness submission

Overview of the information and generation of the producer's declaration for submission and subsequent review and verification by a registered auditor and final deposit of the declaration of completeness.

[Edit](#) [Explanation](#)

Figure 7 – Tile overview (DoC)

The individual modules will now be described in detail below.

4.2 Recording packaging subject to system participation

Declaration of completeness

To create your declaration of completeness according to VerpackG (from reference year 2019), please enter the relevant data. To conclude, you can check and submit it under "Declaration of completeness submission". Click „Explanation“ to learn more about a particular point.

Company name: Hersteller Registration number: [redacted] Reference year: 2021

General declaration of completeness information

Edit general information

Edit Explanation

Packaging subject to system participation

Packaging volumes subject to system participation per system operator

Edit Explanation

Sector-specific solution volumes

Packaging volumes taken back per sector-specific solution

Edit Explanation

Packaging – non-private final consumer

Packaging according to section 11 (2) sentence 1 No. 2 VerpackG

Edit Explanation

Declaration of completeness submission

Overview of the information and generation of the producer's declaration for submission and subsequent review and verification by a registered auditor and final deposit of the declaration of completeness

Edit Explanation

Figure 8 – Process for entering packaging subject to system participation & sector-specific solution volumes (DoC)

Packaging subject to system participation placed on the German market during the reference year can be entered via the 'Packaging subject to system participation' tile for each system operator. If contractual agreements with sector-specific solutions have been entered into and volumes have been collected accordingly, these volumes must be recorded using the 'Sector-specific solution volumes' tile.

Care should be taken that any reports for a reference year up through the year 2018 must be filed on the basis of the material types in the Verpackungsverordnung (Packaging Ordinance). Reports for reference years from 2019 onwards are filed on the basis of the material types named in the Verpackungsgesetz (Packaging Act). This is directly preset on the systems side depending on the selected year and cannot be changed by the user.

Packaging subject to system participation

Please enter the material types and volumes of all of the packaging subject to system participation placed on the German market for the first time in the past reference year that have undergone system participation with one or more system operator(s). The volumes are to be stated including any deductions made due to damage or unsaleability in accordance with section 7 (3) VerpackG. These deduction volumes are to be entered separately via the tile deduction volumes and are automatically deducted.




Company name:
[REDACTED]

Registration number:
[REDACTED]

Reference year:
2022

Enter volumes for the declaration of completeness

Volumes of material types (in kg with three decimal places, tons must be converted to kg. List can be moved with scroll bar.)

		Further system operator	Total (kg)
System operator		Select	
Glass	0.000 kg		0.000
Paper, paperboard and cardboard	86.521.000 kg		86.521.000
Ferrous metals	0.000 kg		0.000
Aluminium	2.356.000 kg		2.356.000
Beverage carton packaging	0.000 kg		0.000
Other composite packaging	0.000 kg		0.000
Plastics	39.562.000 kg		39.562.000
Other materials	0.000 kg		0.000
Total (kg)	128,439.000		128,439.000
System confirmation of volumes	 BESCHEINIGUNG Mengen.pdf File was uploaded successfully. 		




 

Figure 9 – Volumes input form (packaging subject to system participation)

Volume reports can only be filed when they make reference to system operators who had approval during the reference year. The relevant system operator can be selected via the drop-down menu. For each volume report, a volume confirmation issued by the system on the volumes participating in the system per material type pursuant to section 7 (1) VerpackG must be uploaded in PDF format (only for DoCs pursuant to the Verpackungsgesetz). One document can be uploaded for each system. The volume reports must then be entered per material type, in kilogrammes to the third decimal point. Reports should be entered without thousands separators. To assist users, the mass entries are auto-populated with 0.000 kg⁴ and can be edited.

After the current column has been completed, a new column opens automatically right next to it. If a contractual agreement existed for multiple system operators for the relevant reference year, this can be recorded directly in this input screen.

By clicking on the symbol  at the beginning of the line, the entries in this line can be deleted. Using the navigation bar below, the displayed area can be shifted to the right so that all columns can be viewed and updated.

⁴ If the German version has been selected, the 'full stop' will be displayed as a comma.

Where deduction volumes were declared, these must be entered separately under the 'Deduction volumes' tile (only for DoCs from the 2019 reference year onwards). Deduction volumes reduce the values entered as 'Packaging subject to system participation'.

Deduction volumes

Deduction volumes due to damage or unsaleability according to section 7 (3) VerpackG

Edit >

Click on the 'Edit' button in the 'Deduction volumes' tile. Then the input form below will open.

Deduction volumes

Here, you can enter deduction volumes according to section 7 (3) VerpackG, provided that you have not placed packaging on the market due to damage or unsaleability and have taken back the packaging and recycled it in accordance with the requirements of Section 16 (5) VerpackG. If you want to specify the deduction volumes, documentation of the take-back and recycling of the corresponding packaging volumes according to section 16 (5) VerpackG is needed for each individual case.

Company name: XXXXXXXXXX Registration number: XXXXXXXXXX Reference year: 2022

Enter deduction volumes for the declaration of completeness

Volumes of material types (in kg with three decimal places, tons must be converted to kg. List can be moved with scroll bar.)

		Further system operator	Total deduction
System operator	XXXXXXXXXX	Select ▾	
Glass	0.000 kg		0.000
Paper, paperboard and cardboard	2.310.000 kg		2.310.000
Ferrous metals	0.000 kg		0.000
Aluminium	0.000 kg		0.000
Beverage carton packaging	0.000 kg		0.000
Other composite packaging	0.000 kg		0.000
Plastics	0.000 kg		0.000
Other materials	0.000 kg		0.000
Total deduction	2.310.000		2.310.000

I confirm the take back and recycling in accordance with section 7 (3) in conjunction with section 16 (5) VerpackG and that I have the corresponding recycling documentation available. *

Cancel <
Review >

Figure 10 – Deduction volumes

After all of the entries have been made, click the 'Review' button. This also applies if all the input lines are deleted. The window below will open.

Review

Data have been added.

Please check and save your details:

Volume per Systemoperator

System operator	Total (kg)	Deduction volumes	Total after deduction of the deduction volumes
[REDACTED]	80.000	0.000	80.000

Volume per material type

Material type	Total (kg)	Deduction volumes	Total after deduction of the deduction volumes
Glass	14.000	0.000	14.000
PPC	6.000	0.000	6.000
Ferrous metals	20.000	0.000	20.000
Aluminium	0.000	0.000	0.000
Beverage carton packaging	40.000	0.000	40.000
Other composite packaging	0.000	0.000	0.000
Plastics	0.000	0.000	0.000
Other materials	0.000	0.000	0.000

Overall report total: 80.000 kg

Edit data Save

Figure 11 – Overview of review result of the previous entries

This window displays a summary of the entries. If it is necessary to make any corrections, the user can return to the 'Packaging subject to system participation' input screen by clicking on the 'Edit data' button. To save the data in LUCID, click on the 'Save' button if the review result is correct. After the 'Save' button is clicked, the window below will open and the process can then be closed by clicking on the 'OK' button.

Volumes per system operator

Volumes saved successfully.

OK

Figure 12 – Confirmation dialogue (saving message)

Before the saving process is finalised, consistency checks are carried out in LUCID. If any irregularities are detected, they will be displayed as in the example in figure 10. The plausibility checks include, for example, checking very large or very small volumes, zero volumes or any other deviations, e.g., a 5% difference vis-à-vis the data saved in LUCID for the previous year.

Warnings and suggestions

- [REDACTED]
 - Data reporting contains very large input.

Figure 13 – Review result (warnings and messages)

In the event that it is later necessary to correct the volumes entered, you can make changes afterwards. After the 'Edit' button is clicked in the 'Packaging subject to system participation' tile, the volumes currently saved are displayed. They can be overwritten and changed accordingly.

4.3 Recording the volumes for sector-specific solutions

If contractual agreements with sector-specific solution providers have been entered into, the relevant volumes must be entered using the 'Sector-specific solution volumes' tile.

The screenshot displays the 'Declaration of completeness' web interface. At the top, it shows the company name 'Hersteller' and the registration number. Below this, there are several sections for entering data:

- General declaration of completeness information:** Includes an 'Edit' button and an 'Explanation' link.
- Packaging subject to system participation:** Includes an 'Edit' button and an 'Explanation' link.
- Sector-specific solution volumes:** This section is highlighted with an arrow pointing to an 'Edit' button. It includes an 'Explanation' link.
- Packaging - non-private final consumer:** Includes an 'Edit' button and an 'Explanation' link.
- Declaration of completeness submission:** Includes an 'Edit' button and an 'Explanation' link.

Figure 14 – Process for entering sector-specific solution volumes (DoC)

As can be seen in the screenshot below, the functionalities are nearly identical to those in the 'Packaging subject to system participation' tile.

Volumes sector-specific solution

Please enter the total packaging per material type that was collected by one or more sector-specific solution(s) according to section 8 VerpackG (Packaging Act) below.

Enter volumes for the declaration of completeness

Volumes of material types (in kg with three decimal places, tons must be converted to kg. List can be moved with scroll bar.)

sector-specific solution	<input type="text"/>
Glass	<input type="text" value="0.000"/> kg
Paper, paperboard and cardboard ⓘ	<input type="text" value="0.000"/> kg
Ferrous metals ⓘ	<input type="text" value="0.000"/> kg
Aluminium ⓘ	<input type="text" value="0.000"/> kg
Beverage carton packaging ⓘ	<input type="text" value="0.000"/> kg
Other composite packaging ⓘ	<input type="text" value="0.000"/> kg
Plastics	<input type="text" value="0.000"/> kg
Other materials ⓘ	<input type="text" value="0.000"/> kg
Total (kg)	

Figure 15 – Volumes input screen (sector-specific solution)

The only difference to the process described in chapter 4.2 Recording packaging subject to system participation is that no selection menu is shown in the sector-specific solution field; instead, the name of the corresponding sector-specific solution is shown for selection after the first four letters of the name have been entered. It should be noted that only those sector-specific solutions are shown in the selection menu where notification of their activities as sector-specific solution for the reference year has been given as legally required.

4.4 Packaging: non-private final consumer (section 11 (2) no. 2 VerpackG)

Declaration of completeness

To create your declaration of completeness according to VerpackG (from reference year 2019), please enter the relevant data. To conclude, you can check and submit it under "Declaration of completeness submission". Click „Explanation“ to learn more about a particular point.

Company name: **Hersteller** Registration number: **[REDACTED]** Reference year: **2021**

General declaration of completeness information

Edit general information

[Edit](#) [Explanation](#)

Packaging subject to system participation

Packaging volumes subject to system participation per system operator

[Edit](#) [Explanation](#)

Sector-specific solution volumes

Packaging volumes taken back per sector specific solution

[Edit](#) [Explanation](#)

Packaging – non-private final consumer

Packaging according to section 11 (2) sentence 1 No. 2 VerpackG

[Edit](#) [Explanation](#)

Declaration of completeness submission

Overview of the information and generation of the producer's declaration for submission and subsequent review and verification by a registered auditor and final deposit of the declaration of completeness

[Edit](#) [Explanation](#)

Figure 16 – Process for entering non-private final consumer volumes (DoC)

Producers and distributors of retail packaging that does not accumulate with (private) final consumers are required to collect – free of charge – used, completely emptied retail packaging at the point where actual handover occurred, or in the immediate vicinity thereof, and transfer the packaging for recovery. These volumes must be entered under the 'Packaging – non-private final consumer' tile.

Packaging – non-private final consumer

Please enter the volumes in kilograms with three decimal places of the packaging according to section 11 Abs. 2 S. 1 Nr. 2 VerpackG, which accrued at non-private final consumers. You must confirm the fulfillment of the recovery requirements with regard to sales packaging and grouped packaging pursuant to section 15 (1) sentence 1 no. 2 VerpackG. Please enter the totals.

Company name:

██████████

Registration number:


██████████

Reference year:

2022

Enter volumes for the declaration of completeness

Volumes of material types (in kg with three decimal places, tons must be converted to kg. List can be moved with scroll bar.)

	
Glass	0.000 kg
Paper, paperboard and cardboard ⓘ	0.000 kg
Ferrous metals ⓘ	0.000 kg
Aluminium ⓘ	0.000 kg
Beverage carton packaging ⓘ	0.000 kg
Other composite packaging ⓘ	0.000 kg
Plastics	0.000 kg
Other materials ⓘ	0.000 kg
Total (kg)	0.000

I hereby confirm compliance with the legal recovery requirements regarding sales packaging and grouped packaging in accordance with section 15 VerpackG. *

< Cancel

Review >

Figure 17 – Input screen: Packaging: non-private final consumer

As can be seen in the Figure 17 – Input screen: Packaging: non-private final consumer' above, the sums of the volumes are recorded here. The notes set out above apply to the recording of volumes. For these volumes, however, it is necessary to confirm transfer for recovery pursuant to section 15 (1) no. 2 VerpackG, and that complete documentation of recovery is available. This confirmation is provided by checking the corresponding checkbox ('I hereby confirm fulfilment of the legal recovery requirements regarding retail and grouped packaging pursuant to section 15 VerpackG'). After confirmation, it is necessary to file the method of recovery. Here it is necessary to indicate the relevant form of recovery by checking the corresponding box. It is possible to select 'self', 'via a third party' or 'self and via a third party'. In the event that volumes pursuant to section 15 (1) no. 2 VerpackG have been filed, these are mandatory entries. It is not possible to save the process without entering this further information.

4.5 Submitting the declaration of completeness

Declaration of completeness

To create your declaration of completeness according to VerpackG (from reference year 2019), please enter the relevant data. To conclude, you can check and submit it under "Declaration of completeness submission". Click „Explanation“ to learn more about a particular point.

Company name: Hersteller Reference year: 2021

General declaration of completeness information

Edit general information

[Edit](#) [Explanation](#)

Packaging subject to system participation

Packaging volumes subject to system participation per system operator

[Edit](#) [Explanation](#)

Sector-specific solution volumes

Packaging volumes taken back per sector-specific solution

[Edit](#) [Explanation](#)

Packaging – non-private final consumer

Packaging according to section 11 (2) sentence 1 No. 2 VerpackG

[Edit](#) [Explanation](#)

Declaration of completeness submission

Overview of the information and generation of the producer's declaration for submission and subsequent review and verification by a registered auditor and final deposit of the declaration of completeness

[Edit](#) [Explanation](#)

Figure 18 – Process for DoC submission

After the 'Declaration of completeness submission' tile is clicked on to conclude the process, an overview of the entries is displayed.

Deposit declaration of completeness

Overview of the information and generation of the producer's declaration for submission and subsequent review and verification by a registered auditor and final deposit of the declaration of completeness.

Company name: Hersteller Reference year: 2021

Summary

General declaration of completeness information

Registration number: [redacted] Name (company name): Hersteller

Reference year: 2021

DoC reason: Environmental

Type of packaging: Packaging

Auditor: Mary Power

Declaration of consent (optional): I hereby consent to the registered auditor I have indicated here being supplied with the data and documents to audit my declaration of completeness for the selected reference year directly via UCCD. No.

System operator volumes

Packaging subject to system participation according to section 7 (1) VerpackG/Packaging Act per system operator in kg.

System operator	Glass	PVC	Various metals	Aluminium	Beverage carton packaging	Other composite packaging	Plastics	Other materials	System confirmation of volumes
System operator 1	14.000	0.000	20.000	0.000	40.000	0.000	0.000	0.000	Download (PDF-Datei: 10,5 KB)
Total (kg)	14.000	0.000	20.000	0.000	40.000	0.000	0.000	0.000	

No reduction volumes declared.

Total (kg) after deducting the deduction amounts per system operator in kg:

System operator	Glass	PVC	Various metals	Aluminium	Beverage carton packaging	Other composite packaging	Plastics	Other materials
System operator 1	14.000	0.000	20.000	0.000	40.000	0.000	0.000	0.000
Total (kg)	14.000	0.000	20.000	0.000	40.000	0.000	0.000	0.000

Volumes sector-specific solution

No sector-specific solution volumes declared.

Packaging – non private final consumer

No packaging volumes specified which do not occur at private final consumers section 11 (2) sentence 1 No. 2 VerpackG.

[Back](#) [Generate producer's declaration](#)

Figure 19 – Summary, filing and submission of the DoC

If any corrections need to be made to the data, click on the 'Back' button to return to the 'Declaration of completeness' screen.

If all the data has been recorded accurately, then click on the 'Generate producer declaration' button. If values have not been entered into every module, a window will open with the message that no values have been recorded in a specific module. This provides a reminder function for producers who have overlooked a module that is relevant for them. However, the process can be continued if no data is entered in that module. Example: You filed volumes in the 'Packaging subject to system participation' module. After clicking on the 'Generate producer declaration' button, a message appears that no sector-specific solution has been recorded and a message that no volumes under section 11 (2) no. 2 VerpackG have been filed. The window below will then open:

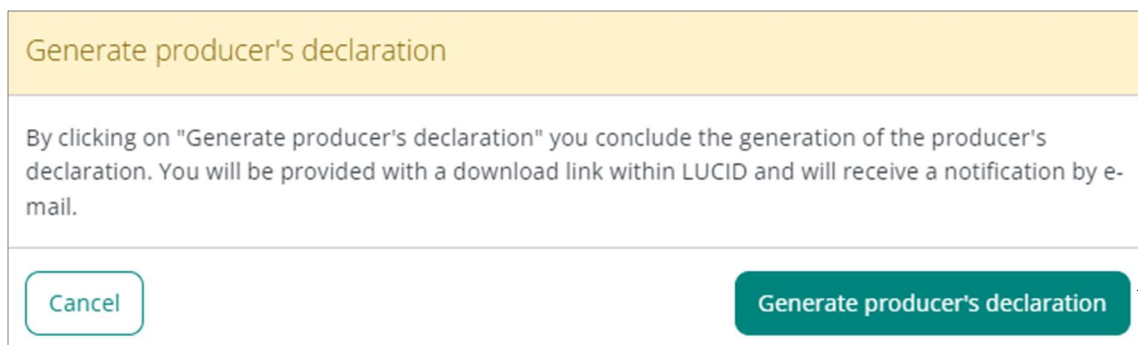


Figure 20 – Complete DoC filing confirmation dialogue

Then click on the 'Generate producer declaration' button and the window below will open.

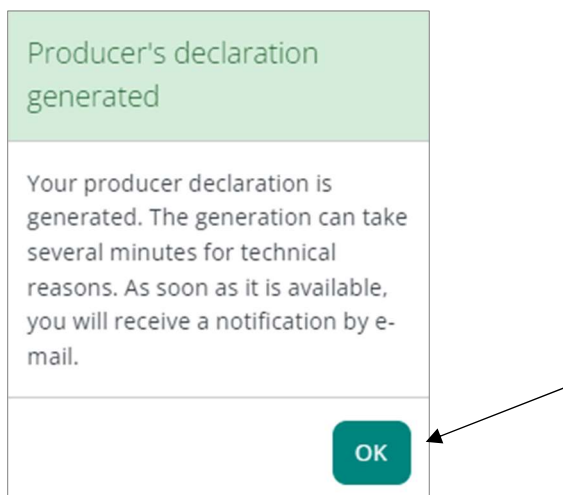


Figure 21 – DoC filing successful dialogue

After the process for filing the DoC set out above has been completed, LUCID will send an e-mail containing the text below and a download link to the producer and, where applicable, the authorised representative and the appointed third party; the subject line of this e-mail will read 'LUCID: Declaration of completeness provided' (cf. example below). If the declaration of consent has been provided in the 'General declaration of completeness information' for LUCID to provide the auditor with the data and documents, LUCID will also send an e-mail with a download to the auditor.

Declaration of completeness filed

Dear Mr [REDACTED]

Your declaration of completeness [REDACTED] were filed in the LUCID register database of the Zentrale Stelle Verpackungsregister on 03.04.2020. You can view it here:

[overview page](#)

or at [http://\[REDACTED\]](#)

Where you have consented to your registered auditor pursuant to section 27 (2) VerpackG (Packaging Act) receiving your data and documents directly via the LUCID Packaging Register, your auditor will receive a copy of this e-mail.

Yours sincerely,

Please note: This English version is a convenience translation; the German version is binding.

Figure 22 – DoC confirmation e-mail with download link

If the e-mail is not in your inbox, please check your spam folder. After the download link contained in the e-mail has been clicked, the user will be asked to enter their login details and then brought to the 'File declaration of completeness' input screen.

Independently of the e-mail transmission, you can download the producer declaration approximately 15 minutes after filing it. To do so, select the 'View' button in the overview of the declarations of completeness.

Declaration of completeness according to VerpackG

You can submit a new declaration of completeness (DoC) according to VerpackG (from reference year 2019) here (click on „add declaration“), or continue one you have already started (click on „edit“). You can amend existing declarations of completeness (click on „correct“). A declaration of completeness can only ever be submitted for the previous calendar year (reference year). It is not possible to file one during the current calendar year. The information must be reviewed and verified by a registered auditor. Only then is the declaration of completeness filed in accordance with § 11 (1) VerpackG. You can use LUCID to find registered auditors in the Zentrale Stelle's (Central Agency's) register of auditors. The Zentrale Stelle is under statutory obligation to publish a list of producers who have filed a declaration of completeness; this list is published in the public register on the Zentrale Stelle's website. Publication starts on the 16 May for the previous reference year. The list is updated on a regular basis.

Reference year	Status	DoC reason	Actions
2021	Started	Duty triggered by exceeding thresholds	<input type="button" value="Edit"/>
2020	Started	Duty triggered by exceeding thresholds	<input type="button" value="Edit"/>
2021	Producer's declaration generated	Other/optional	<input type="button" value="View"/> <input type="button" value="Correct"/>

1 - 3 of 3 items

Figure 23 – View DoC

The remaining process is described in the following chapter.

4.6 File declaration of completeness

An overview of the recorded data is displayed. For technical reasons, it may take a few minutes before the button appears.

Dashboard > Declaration of completeness > Declaration of completeness according to VerpackG > Deposit declaration of completeness

Deposit declaration of completeness

Overview of the information and generation of the producer's declaration for submission and subsequent review and verification by a registered auditor and final deposit of the declaration of completeness.

Company name: ██████████ Registration number: ██████████ Reference year: 2019

Deposit declaration of completeness

[Download producer declaration](#)

Your producer declaration is generated and can then be downloaded. The generation can take several minutes for technical reasons. As soon as it is available, you will receive a notification by e-mail.

Summary

General declaration of completeness information

Registration number	Name (company name)
██████████	██████████
Reference year ⓘ	
2019	

Figure 24 – Filing a declaration of completeness (data not yet generated)

If you update your browser page, a 'Download' button will be displayed after the data is generated, as shown in Figure 25. Clicking the button will generate a PDF of the producer declaration

Company name: ██████████ Registration number: ██████████ Reference year: 2021

Summary

[Download producer declaration](#)

The producer declaration is now ready for download.

[Download](#) ←

General declaration of completeness information

Registration number	Name (company name)
BEZ100421030073	██████████
Reference year ⓘ	
2021	

DoC reason ⓘ
Other/optional

Type of packaging ⓘ
Packaging

Auditor ⓘ
██████████

Declaration of consent (optional): I hereby consent to the registered auditor I have indicated here being supplied with the data and documents to audit my declaration of completeness for the selected reference year directly via LUCID.
Yes

Figure 25 – Downloading a producer declaration (data generated)

This producer declaration in PDF format sealed by the ZSVR can be sent to the auditor manually outside of LUCID. If the producer / authorised representative / appointed third party has given their

Last updated: 28 November 2023

consent to sharing data with the auditor, the data and documents will be available to the auditor in LUCID. In this case, the auditor can view and download the producer declaration directly. Naturally the producer can always view and/or download their data, even if the DoC was filed by an authorised representative or appointed third party.

For security, the document bears the qualified electronic signature (QES) of the ZSVR, as shown by the ZSVR's seal in the screenshot below. This document must not be changed, neither in content nor form.

Figure 26 – Producer declaration with the ZSVR's QES

By navigating downwards in the 'File declaration of completeness' screen using the navigation bar, the tiles below become visible.

Figure 27 – Overview of the tiles to file PDF documents

The subsequent uploading of audit documents in LUCID can either be done by the producer / authorised representative / appointed third party or by the auditor, and is set out beginning in chapter 7.3 Uploading the producer declaration.

4.7 Correcting the declaration of completeness after generating the producer declaration

The producer / authorised representative / appointed third party is able to update the data at any point before the producer declaration is generated.

DoCs that are filed because the thresholds were exceeded can be corrected up to 15 May of the year (the latest possible filing date pursuant to section 11 (1) VerpackG). Correcting the producer declaration after 15 May is technically possible, but doing so will mean the deadline has not been met.

It is still possible to make corrections before the applicable deadline, even if audit documents have already been filed (cf. 7 'Uploading audit documents'). To correct the data, the entire filing process, including auditing and confirmation, must be repeated by an auditor registered with the ZSVR.

If a declaration of completeness that has already been filed needs to be corrected, select the 'Correct' button in the overview of the filed declarations of completeness.

Reference year	Status	DoC reason	Actions
2021	Started	Duty triggered by exceeding thresholds	<input type="button" value="Edit"/>
2020	Started	Duty triggered by exceeding thresholds	<input type="button" value="Edit"/>
2021	Producer's declaration generated	Other/optional	<input type="button" value="View"/> <input type="button" value="Correct"/>

1 - 3 of 3 items

Figure 28 – Correcting a DoC

The user will first receive the following message. If they confirm this message by clicking on the 'OK' button, the user will be directed to the declaration of completeness view (cf. 'Figure 7 – Tile overview (DoC)'). The data already filed is preset in the input screens and can be supplemented or corrected. The producer declaration then has to be generated anew (cf. 4.6 'File declaration of completeness').

Correct producer's declaration

Do you really want to withdraw and correct the declaration of completeness? Attention: The submission of the declaration of completeness will be cancelled by the correction and all already uploaded verification documents will be deleted. It is then considered as not submitted. If the declaration of completeness is to be submitted again after changes have been made, the producer's declaration must be regenerated, signed and uploaded. The other inspection documents must also be uploaded again and the inspection result must be set.

Figure 29 – Correct producer declaration warning message

The last filed DoC is applicable. Data previously filed in LUCID are historical.

5 Declaration of completeness submission by an appointed third party

Producers have the option of having an appointed third party submit the DoC. To do so, the appointed third party must register in LUCID. Once the registration has been completed and has been approved by the ZSVR, the appointed third party can sign into LUCID. By clicking on the 'Edit' button of the corresponding tile, the appointed third party firstly accesses the declarations of completeness sub-menu, and after further selection, then accesses an overview for managing the producers' DoC.

LUCID Dashboard

Welcome to your LUCID Dashboard.

ThirdParty-ID: [REDACTED] Last login: 18.08.2022
 Registration status: Active Registration date: 07.03.2022
 Last master data update: 07.03.2022

Edit master data
 Change master data, change login, close registration
 Edit >

Declarations of completeness
 Edit declarations of completeness
 Edit >

Figure 30 – LUCID, dashboard of an appointed third party, all tiles

Declarations of completeness

Below you can find the inquiries and accepted declarations of completeness (DoC) of those producers who have asked you to submit their declaration of completeness.

Declarations of completeness according to VerpackV
 Edit the declarations of completeness according to VerpackV (up to reference year 2018).
 Edit >

Declarations of completeness according to VerpackG
 Edit the declarations of completeness according to VerpackG (from reference year 2019).
 Edit >

Figure 31 – Appointed third party: declarations of completeness

5.1 Manage declaration of completeness

The 'Manage declaration of completeness' sub-menu view can be updated by clicking on the 'Requests overview' button.

Declarations of completeness according to VerpackG

After clicking on "request overview", you can display a list of producers who have requested that you submit a declaration of completeness for them. The table below contains a list of producers who have requested that you agree to making a submission for them as an appointed third party and whose requests you have approved.

2022

Request Overview

Reference year	Calendar year	Contracting producer	Authorised representative	Status	DoC reason	Actions
No items to display						

Figure 32 – LUCID DoC, managing declarations of completeness

Clicking on the 'Request overview' button in the 'Manage declaration of completeness' view in the sub-menu will open the 'Manage requests' view. This displays all of the requests relating to the appointed third party's relevant registration number (status: 'New'). The request status, date and reference year are also visible.

Approving or rejecting a DoC request can be done via the relevant sub-menu, using the 'Details' button.

Manage requests

By clicking on "Details", you can view the information of the producer.

Reference year	Calendar year	Status	Requested on	Accepted on	Declined on	Producer	Authorised representative	Actions
2021	2022	New	29.04.2022			██████		Details
2021	2022	Cancelled	18.03.2022	18.03.2022	29.04.2022	██████		Details

1 - 2 of 2 items

Figure 33 – LUCID DoC, manage requests

The following screenshot shows the producer's request details. There are two buttons in the lower section of the dialogue that can be used to either reject or accept requests. The producer related to the DoC will be shown in the LUCID portal whether the appointed third party has rejected or accepted the request.

Request details

Here you can view an overview of the data of the producer who requested that you submit its declaration of completeness as an appointed third party.

Request details

Producer data

company name ⓘ
[REDACTED]

E-mail address ⓘ
[REDACTED]

first name ⓘ surname ⓘ
Max Mustermann

Additional producer data

country ⓘ
Germany

Postcode ⓘ city ⓘ street ⓘ house number ⓘ
12345 Regebogen Regenbogenstraße 124

Request data

Reference year ⓘ
2021

calendar year ⓘ Requested on ⓘ status ⓘ
2022 29.04.2022 New

Reject ✕
Accept ✓

Figure 34 – LUCID DoC, request details

After confirming the request in the 'Request details' view, the user is returned to the 'Manage requests' menu. The changes in status will be visible in this menu.

Manage requests

By clicking on "Details", you can view the information of the producer.

Reference year ▼	Calendar year ▼	Status ⓘ ▼	Requested on	Accepted on	Declined on	Producer ▼	Authorised representative ▼	Actions
2021	2022	Accepted	29.04.2022	01.09.2022		[REDACTED]		Details
2021	2022	Cancelled	18.03.2022	18.03.2022	29.04.2022	[REDACTED]		Details

1 - 2 of 2 items

Figure 35 – LUCID DoC, manage requests (updated status)

By clicking on 'Manage declaration of completeness' shown at the top of the menu, users can navigate back to the DoCs screen.

5.2 Create/edit a producer's DoC

Clicking on the 'Start' button in the 'Manage declaration of completeness' menu begins the DoC submission process.

Figure 36 – Manage declaration of completeness, start actions

If a DoC has already been started, the 'Edit' button will be displayed in place of the 'Start' button. By clicking on this button, the DoC can be edited further.

Figure 37 – Manage declaration of completeness, edit actions

Clicking on the relevant button will open the 'Declaration of completeness' menu.

5.3 Overview of 'appointed third party' declaration of completeness dialogue

This menu is set up in the same way as the producer menu. The functions of the 'Declaration of completeness' menu are described in chapter 4.2: Recording 'Packaging subject to system participation'.

Dashboard > Declaration of completeness > Declaration of completeness according to VerpackG > Declaration of completeness

Declaration of completeness

To create your declaration of completeness according to VerpackG (from reference year 2019), please enter the relevant data. To conclude, you can check and submit it under "Declaration of completeness submission". Click „Explanation“ to learn more about a particular point.

Company name: [REDACTED] Registration number: [REDACTED] Reference year: 2019

General declaration of completeness information

Edit general information

Explanation [Edit >](#)

Packaging subject to system participation

Packaging volumes subject to system participation per system operator

Explanation [Edit >](#)

Sector-specific solution volumes

Packaging volumes taken back per sector-specific solution

Explanation [Edit >](#)

Packaging – non-private final consumer

Packaging according to section 11 (2) sentence 1 No. 2 VerpackG

Explanation [Edit >](#)

Declaration of completeness submission

Overview of the information and generation of the producer's declaration for submission and subsequent review and verification by a registered auditor and final deposit of the declaration of completeness

Explanation [Edit >](#)

Figure 38 – Overview of tiles for appointed third party DoCs

6 Declaration of completeness submission by an authorised representative

Producers without a branch in Germany can appoint an authorised representative located in Germany to fulfil their obligations under the Verpackungsgesetz for them. This includes the submission of a declaration of completeness in the producer's name.

For an appointment to be valid, a written contractual agreement must be concluded in German. Furthermore, the authorised representative is required to create a login for the LUCID Packaging Register.

LUCID dashboard

Welcome to your LUCID dashboard.

Authorised representative's ID:	[REDACTED]	Last login:	04.11.2022
Company name:	[REDACTED]	Date of login creation:	17.03.2022
Login status:	Active	Last master data update:	14.10.2022

Edit master data

Change master data, terminate login

[Edit >](#)

Manage authorisations

Manage authorisations

[Edit >](#)

Figure 39 – Authorised representative's dashboard following login generation

6.1 Manage producers

LUCID dashboard

Welcome to your LUCID dashboard.

Authorised representative's ID: DE8517515392304
 Company name: Kirsche [REDACTED]
 Login status: Active [REDACTED]

Last login: 04.11.2022
 Date of login creation: 17.03.2022
 Last master data update: 14.10.2022

Edit master data

Change master data, terminate login

[Edit >](#)

Manage authorisations

Manage authorisations

[Edit >](#)

Figure 40 – 'Manage producers' tile

Once the login for an authorised representative has been created, the producer located outside of Germany can appoint the authorised representative to fulfil the producer's obligations under the Verpackungsgesetz. This appointment can be done while registering as a producer, but it can also be done for existing producer registrations. Once the authorised representative has accepted the appointment, the authorised representative can access the authorising producer's dashboard by clicking on the 'Manage producers' tile.

Producer requests for authorisation

Here you can see a list of requests from producers who have named you as their authorised representative in LUCID.

Status	Registration number	Producer	Date requested	Date accepted	Date rejected/withdrawn/closed	Actions
Accepted	[REDACTED]	[REDACTED]	10.11.2022	10.11.2022		Details Producer dashboard Close
Closed	[REDACTED]	[REDACTED]	14.10.2022	14.10.2022	20.10.2022	
Closed	[REDACTED]	[REDACTED]	08.09.2022	08.09.2022	14.10.2022	

1 - 3 of 3 items

Figure 41 – Producer dashboard access for authorised representatives

LUCID Dashboard

Welcome to your LUCID Dashboard.

Registration number	[REDACTED]	Last login:	21.10.2022
Company name	Schokolade	Registration date:	07.03.2022
Registration status:	Registered	Last profile update:	21.10.2022
Last volume report:	01.04.2022		
Type of last volume report:	Intra-year volume report		

Data report

Submit data report

[Edit >](#)

Declaration of completeness

Edit declaration of completeness

[Edit >](#)

Figure 42 – Authorised representative's view of the producer dashboard

6.2 Filing a declaration of completeness

If there is an active authorisation, i.e. the status of the authorisation is shown to be 'Accepted' or 'In process', only the authorised representative can file a DoC for the producer. Producers can then only view the DoC, but cannot make changes or file a DoC themselves.

Registration number	[REDACTED]	Last login:	14.10.2022
Company name	Schokolade	Registration date:	07.03.2022
Registration status:	Registered	Last profile update:	07.03.2022
Last volume report:	01.04.2022		
Type of last volume report:	Intra-year volume report		

Declaration of completeness according to VerpackG

You can submit a new declaration of completeness (DoC) according to VerpackG (from reference year 2019) here (click on „add declaration“), or continue one you have already started (click on „edit“). You can amend existing declarations of completeness (click on „correct“). A declaration of completeness can only ever be submitted for the previous calendar year (reference year). It is not possible to file one during the current calendar year. The information must be reviewed and verified by a registered auditor. Only then is the declaration of completeness filed in accordance with § 11 (1) VerpackG. You can use LUCID to find registered auditors in the Zentrale Stelle's (Central Agency's) register of auditors. The Zentrale Stelle is under statutory obligation to publish a list of producers who have filed a declaration of completeness; this list is published in the public register on the Zentrale Stelle's website. Publication starts on the 16 May for the previous reference year. The list is updated on a regular basis.

Reference year	Status	DoC reason	Actions
2021	Producer's declaration generated	Duty triggered by exceeding thresholds	View Correct

1 - 1 of 1 items

[Add declaration](#)

Figure 43 – DoC options for authorised representatives

Declaration of completeness according to VerpackG

You can submit a new declaration of completeness (DoC) according to VerpackG (from reference year 2019) here (click on „add declaration“), or continue one you have already started (click on „edit“). You can amend existing declarations of completeness (click on „correct“). A declaration of completeness can only ever be submitted for the previous calendar year (reference year). It is not possible to file one during the current calendar year. The information must be reviewed and verified by a registered auditor. Only then is the declaration of completeness filed in accordance with § 11 (1) VerpackG. You can use LUCID to find registered auditors in the Zentrale Stelle's (Central Agency's) register of auditors. The Zentrale Stelle is under statutory obligation to publish a list of producers who have filed a declaration of completeness; this list is published in the public register on the Zentrale Stelle's website. Publication starts on the 16 May for the previous reference year. The list is updated on a regular basis.

Reference year	Status	DoC reason	Actions
2021	Producer's declaration generated	Duty triggered by exceeding thresholds	View

1 - 1 of 1 items

Figure 44 – DoC options for producers with an active authorisation

The remaining process for DoC filing by an authorised representative is identical with the DoC filing process for domestic producers and producers located abroad who do not have an authorised representative (cf. p. 17 et seq.).

Declaration of completeness

To create your declaration of completeness according to VerpackG (from reference year 2019), please enter the relevant data. To conclude, you can check and submit it under "Declaration of completeness submission". Click „Explanation“ to learn more about a particular point.

Company name: [REDACTED] Registration number: [REDACTED] Reference year: 2021

General declaration of completeness information

Edit general information

[Edit >](#)
[Explanation >](#)

Packaging subject to system participation

Packaging volumes subject to system participation per system operator

[Edit >](#)
[Explanation >](#)

Sector-specific solution volumes

Packaging volumes taken back per sector-specific solution

[Edit >](#)
[Explanation >](#)

Packaging – non-private final consumer

Packaging according to section 11 (2) sentence 1 No. 2 VerpackG

[Edit >](#)
[Explanation >](#)

Figure 45 – DoC filing overview

7 Uploading audit documents

7.1 Navigating to the declaration of completeness for auditors screen

If the auditor uses the download link in the e-mail sent to them, the 'Review of completeness summary' will be loaded directly after login.

Last updated: 28 November 2023

If the auditor does not use the link, they can click on the 'Edit' button shown in the 'Declarations of completeness' tile in the dashboard displayed immediately following logging onto LUCID.

Figure 46 – LUCID dashboard (auditor view)

This brings the auditor to the 'Declarations of completeness' overview. Clicking on the 'Edit' button in the respective tile brings the user to the 'Declaration of completeness according to VerpackG' or to the 'Declaration of completeness according to VerpackV' overview.

Reference year	Producer	Authorised Representative	Status	DoC reason	Actions
2021	Schokolade		Producer's declaration generated	Duty triggered by exceeding thresholds	View

Figure 47 – DoC status overview

In the overview shown above, only those DoCs are displayed to the auditor which the producer / authorised representative / appointed third party has indicated as being the responsible auditor, and for which the producer / authorised representative / appointed third party has completed the filing by generating the producer declaration (cf. 4.5 'Declaration of completeness submission')

Clicking on the 'View' button opens the summary of the declaration of completeness. Using the navigation bar to navigate downwards shows the tiles below, which can be used to upload audit documents. The process is described starting in chapter 7.3 Uploading the producer declaration.

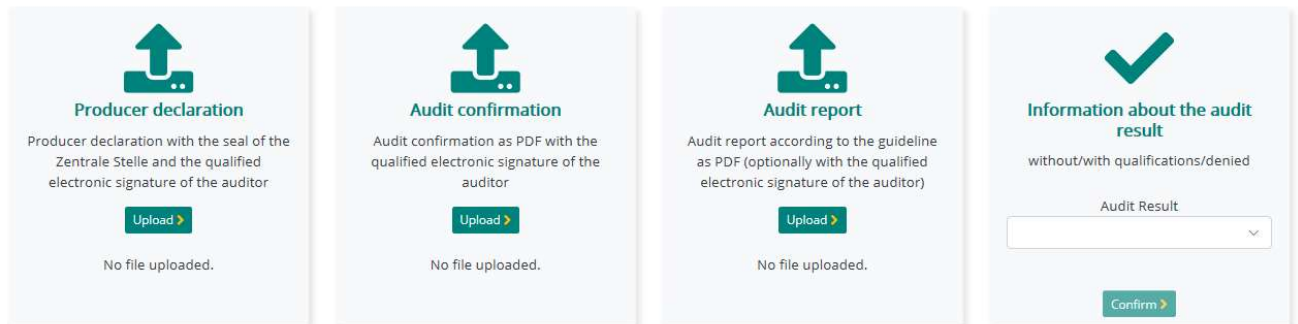


Figure 48 – Overview of the tiles to submit PDF documents

7.2 Navigating to the declaration of completeness for producers / appointed third parties screen

If the audit result is supposed to be uploaded by the producer instead of the auditor, the following process should be followed:

After signing in, the dashboard is shown. Click on the 'Edit' button in the 'Declaration of completeness' tile.

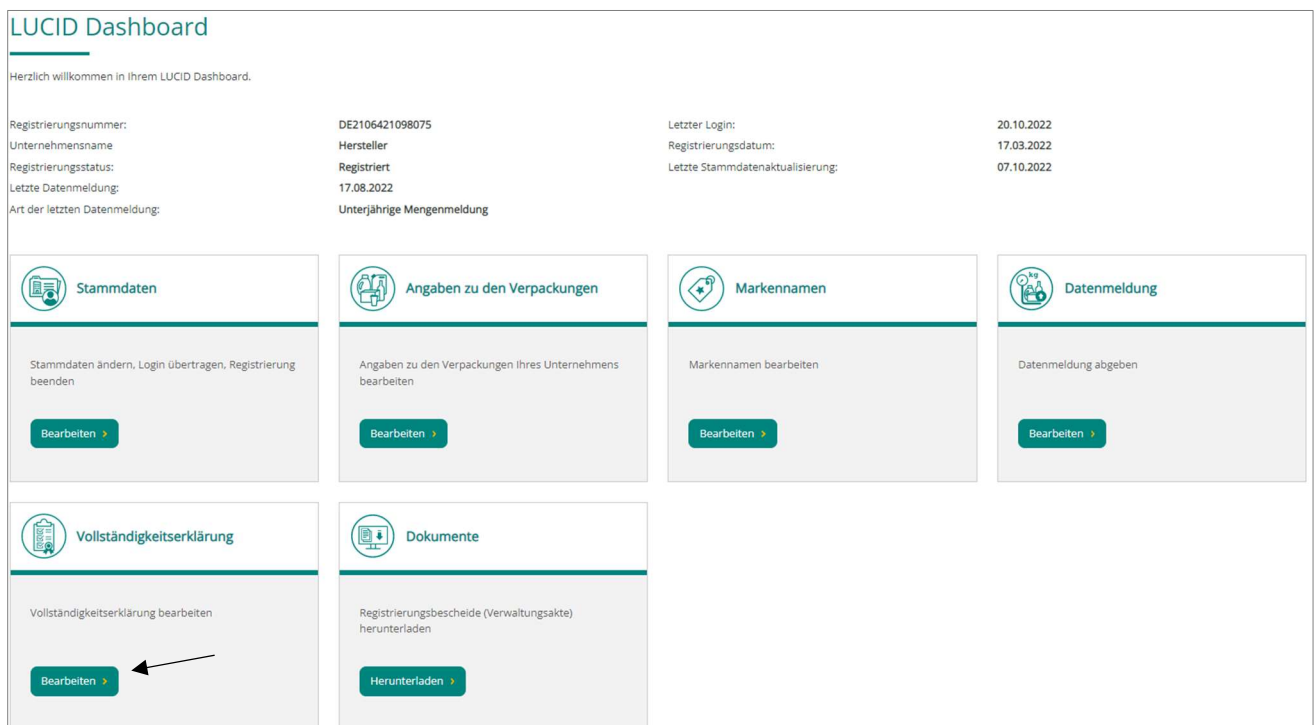


Figure 49 – LUCID dashboard (producer), declaration of completeness

This brings the user to the 'Declarations of completeness' overview. Clicking on the 'Edit' button in the respective tile brings the user to the 'Declaration of completeness according to VerpackG' or to the 'Declaration of completeness according to VerpackV' overview.

Last updated: 28 November 2023

Declaration of completeness

You can submit a new declaration of completeness (DoC) here, or continue one you have already started. You can amend existing declarations of completeness. If the de minimis threshold set out in section 11 (4) VerpackG (Packaging Act) is exceeded (glass > = 80,000 kg, PPC (paper, paperboard and cardboard) > = 50,000 kg or the total of the other materials named in section 16 (2) VerpackG > = 30,000 kg), producers are required to file a declaration of completeness by 15 May of each year. Regardless of the de minimis threshold, the Zentrale Stelle (Central Agency) or the responsible state authority has the power to order that a declaration of completeness be filed by a certain date. Producers can also voluntarily submit their declaration of completeness here at any time.

Declaration of completeness according to VerpackG

Filing of the declaration of completeness according to VerpackG (from reference year 2019)

[Edit >](#)

Declaration of completeness according to VerpackV

Filing of the declaration of completeness according to VerpackV (up to reference year 2018)

[Edit >](#)

Submission of DoC by appointed third party

Edit submission of DoC by a appointed third party

[Edit >](#)

Figure 50 – Selection of the DoC type (producer)

Dashboard > Declaration of completeness > Declaration of completeness according to VerpackG

Declaration of completeness according to VerpackG

You can submit a new declaration of completeness (DoC) according to VerpackG (from reference year 2019) here (click on „add declaration“), or continue one you have already started (click on „edit“). You can amend existing declarations of completeness (click on „correct“). A declaration of completeness can only ever be submitted for the previous calendar year (reference year). It is not possible to file one during the current calendar year. The information must be reviewed and verified by a registered auditor. Only then is the declaration of completeness filed in accordance with § 11 (1) VerpackG. You can use LUCID to find registered auditors in the Zentrale Stelle’s (Central Agency’s) register of auditors. The Zentrale Stelle is under statutory obligation to publish a list of producers who have filed a declaration of completeness; this list is published in the public register on the Zentrale Stelle’s website. Publication starts on the 16 May for the previous reference year. The list is updated on a regular basis.

[Add declaration](#)

Reference year	Status	DoC reason	Actions
2019	Being corrected	Duty triggered by exceeding thresholds	Edit
2019	Producer’s declaration generated	Other/optional	View Correct

« « 1 » »

1 - 2 of 2 items

Figure 51 – Declarations of completeness, edit

The user can then scroll down on the input screen that opens and complete the remaining steps, which are described in the following chapters.

7.3 Uploading the producer declaration

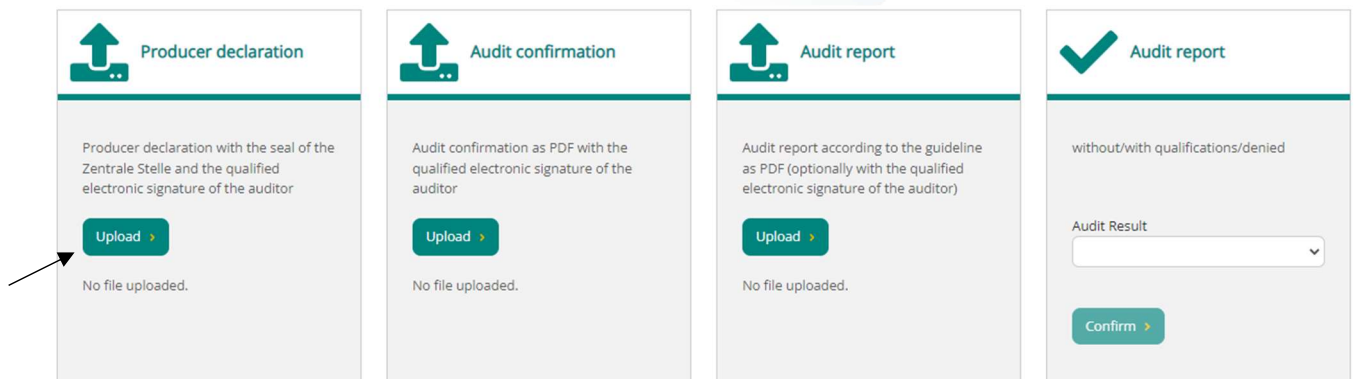


Figure 52 – Submitting the signed producer declaration

By using the 'Producer declaration' tile shown in the screenshot above, the document signed with a QES by the ZSVR and the auditor can be uploaded. Please note that only a document that has not been changed following the download can be uploaded. This applies in particular to amendments made by adding comments, or changes to the file format. Uploading a file that has been changed in form or content will result in an error message. For information on the qualified electronic signature, cf. chapter 10 'Qualified electronic signature'.

Clicking on the 'Upload' button in the 'Producer declaration' tile opens a window. There the user can select the location of the document to be uploaded and click on the 'Upload files' button in LUCID to upload.

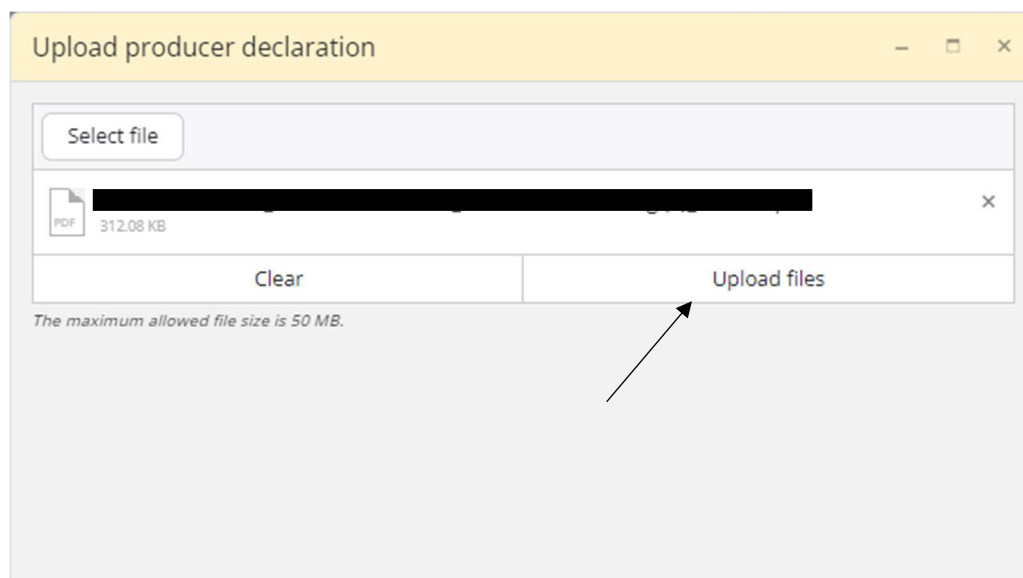


Figure 53 – Producer declaration upload

Once the document has been successfully uploaded, it will be displayed in the 'Producer declaration' tile. If the document has not been correctly signed, the error message below will appear.

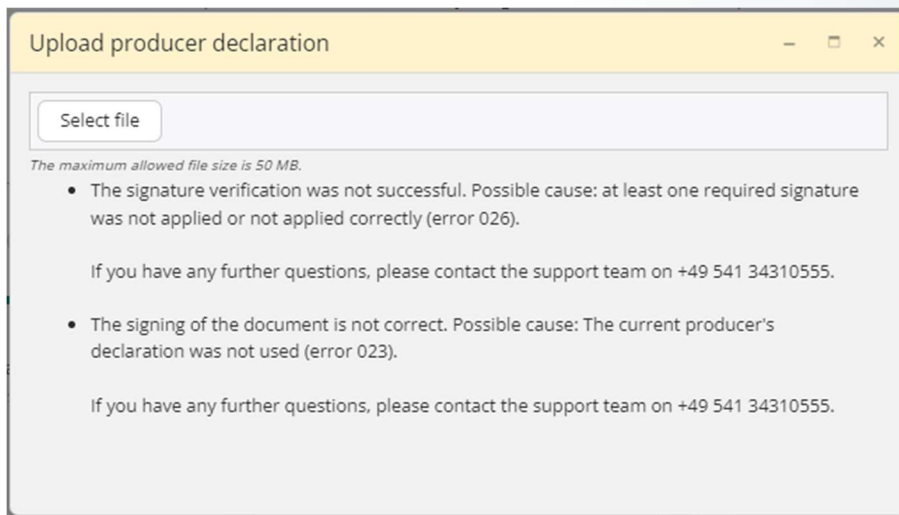


Figure 54 – Producer declaration upload (incl. possible error messages)

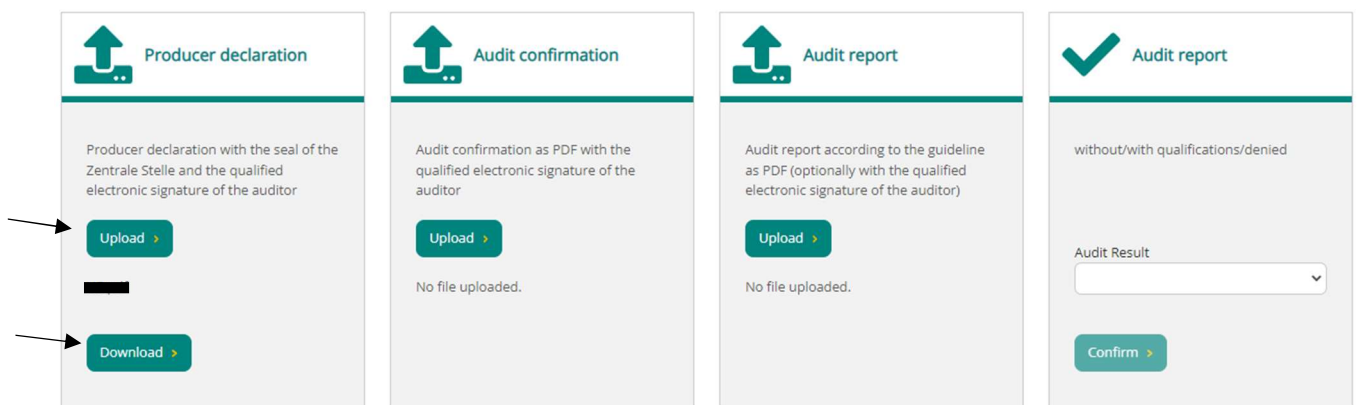


Figure 55 – Notification after successful file upload

If the document has been successfully uploaded, the file name of the document saved in LUCID is visible. This includes the date, producer registration number, a technical ID and the original name of the file. By clicking on the 'Download' button, the document can be downloaded.

7.4 Uploading the audit confirmation

This tile can be used to upload the audit confirmation bearing the auditor's qualified electronic signature. The name of the uploaded document will be displayed in the 'Audit confirmation' tile. The document can be downloaded by clicking on the 'Download' button.

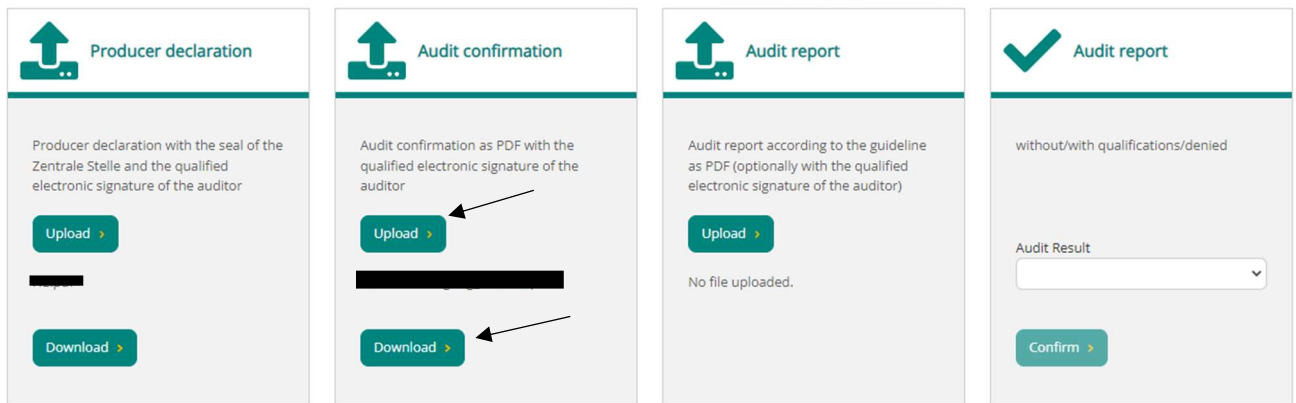


Figure 56 – Submitting the signed audit confirmation

7.5 Uploading the audit report

This tile can be used to upload the audit report. Adding a qualified electronic signature (QES) to the report is optional. The name of the uploaded document is shown in the audit report tile. The document can be downloaded by clicking on the 'Download' button.

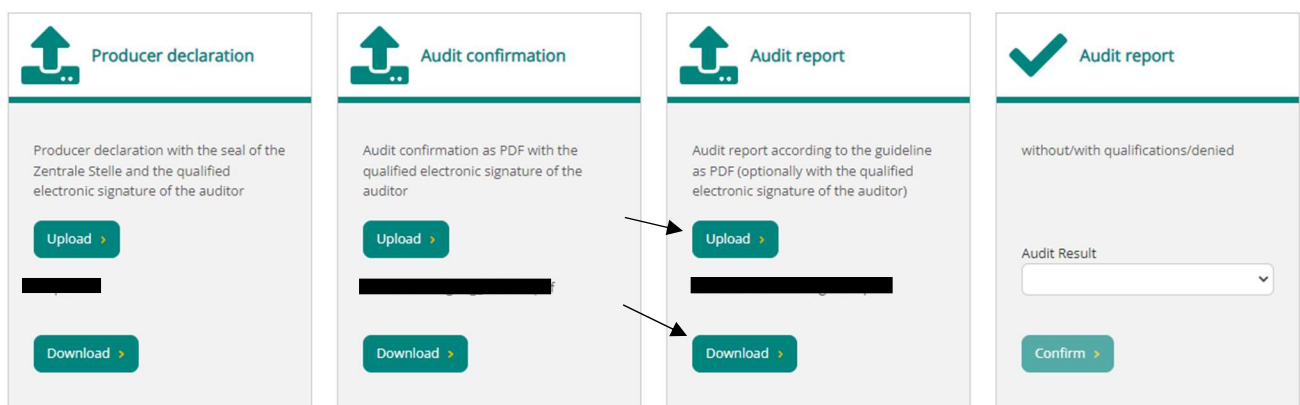


Figure 57 – Submitting the (signed) audit report

7.6 Submitting the audit result

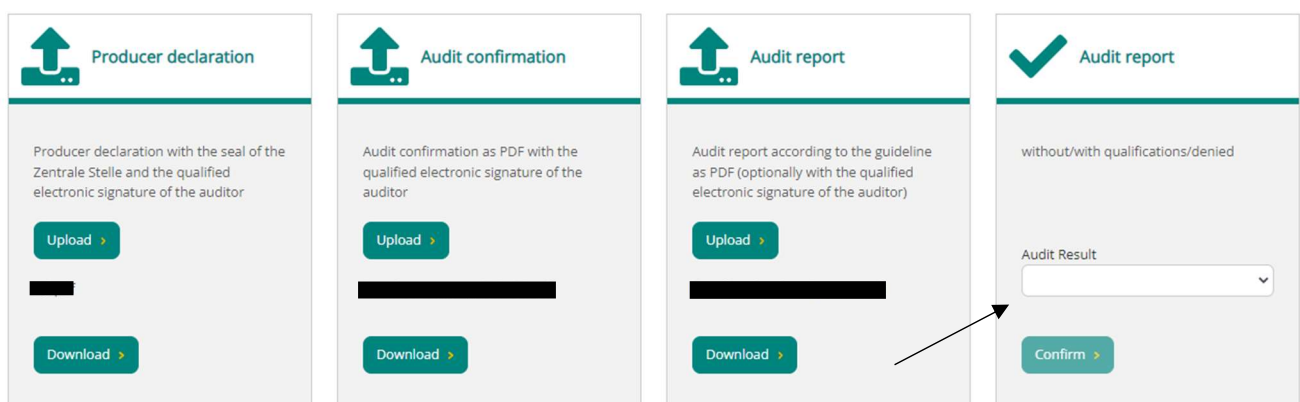


Figure 58 – Entering the audit result

The confirmation when entering the audit result means the DoC is finally submitted. Before the confirmation can be given, it must be indicated in the 'Audit result' field whether the conclusion was 'unqualified' or 'qualified', or whether the auditor declined to confirm the DoC. This selection must (!) correspond to the audit result in the audit confirmation.

Only once all three documents have been successfully filed, the information about the audit result has been entered and the 'Confirm' button has been pressed, and the confirmation has not been declined for technical or substantive reasons, is the DoC deemed fully filed. As part of the technical filing process, the producer's documents are saved in the ZSVR e-file. In addition, producers and, where applicable, auditors / authorised representatives / appointed third parties receive a notification email that the DoC has been fully filed.

Even if the auditor has declined to issue a confirmation for technical or substantive reasons, the audit documents can be uploaded in LUCID and they will also be added to the ZSVR e-file.

The user will receive a confirmation directly in LUCID via the following notification window.



Figure 59 – Confirmation of successful DoC submission

Declarations of completeness can have the following status types.

Name	Description
Outstanding	The DoC submission process has not yet been started. It is 'outstanding' because of the DoC obligation.
Started	The user has started the DoC (which has been saved at section 1 at a minimum).
Being corrected	A DoC that has been filed or audited is being edited again.
Producer declaration generated	The user has saved all of the sections completely, i.e. in addition to data entry, all the necessary documents have been filed.
Being audited	The auditor is in the process of performing the audit and has uploaded at least one document successfully.
Audited: unqualified	The auditor has successfully uploaded all of the documents and the producer will be included in the publicly accessible DoC list for the relevant reference year after 15 May.
Audited: with qualification	The auditor has successfully uploaded all of the documents and the producer will be included in the publicly accessible DoC list for the relevant reference year after 15 May.
Audited: denied	The auditor has successfully uploaded all the documents. There will be no inclusion in the publicly accessible DoC list.

Last updated: 28 November 2023

Name	Description
Invalid	This status is set manually by ZSVR employees if the ZSVR determines during an audit that the DoC is incorrect or incomplete. If this is the case, the producer will no longer be included in the publicly accessible DoC list the next time the database is updated.

Figure 60 – DoC status

Clicking on the 'OK' button will bring users to their LUCID dashboard.

7.7 Resetting after the audit result has been submitted

Users are able to reset the DoC after the audit result has been submitted, taking into account statutory deadlines (cf. 4.7 'Correcting the declaration of completeness after generating the producer declaration').

In their dashboard, users can click on the 'Edit' button in the 'Declaration of completeness' tile and view the DoC again by clicking on the 'View' button. By navigating toward the bottom of the summary shown, users will see the 'Reset audit' tile.

The screenshot shows a dashboard with several tiles. The top-left tile is titled 'Reset audit' and contains a circular refresh icon and the text 'Here you can reset your audit.' with a 'Reset audit >' button. A red arrow points to this button. Below it are four other tiles, each with an 'Upload' and 'Download' button. The first is 'Producer declaration' with an upload icon. The second is 'Audit confirmation' with an upload icon. The third is 'Audit report' with an upload icon. The fourth is 'Audit report' with a checkmark icon, a dropdown menu for 'Audit Result' (set to 'Audited: without qualification'), and a 'Confirm >' button.

Figure 61 – 'Reset audit' tile overview

Clicking on the 'Reset audit' button will display the window below.

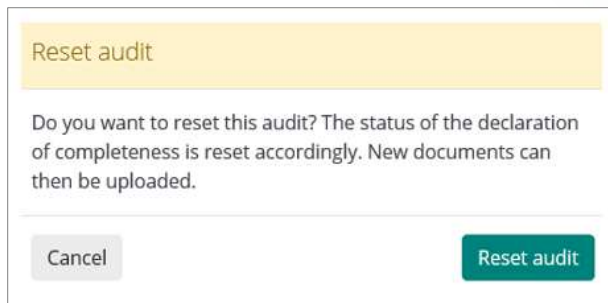


Figure 62 – Reset audit warning message

By clicking on the 'Reset audit' button, the DoC status will be reset and all of the documents uploaded in LUCID during the process will be removed. The process can then be restarted.

The status of the reset DoC will be displayed as 'Being corrected'. The process from that point onward is described in chapter 7.3 'Uploading the producer declaration' and can be worked through again.

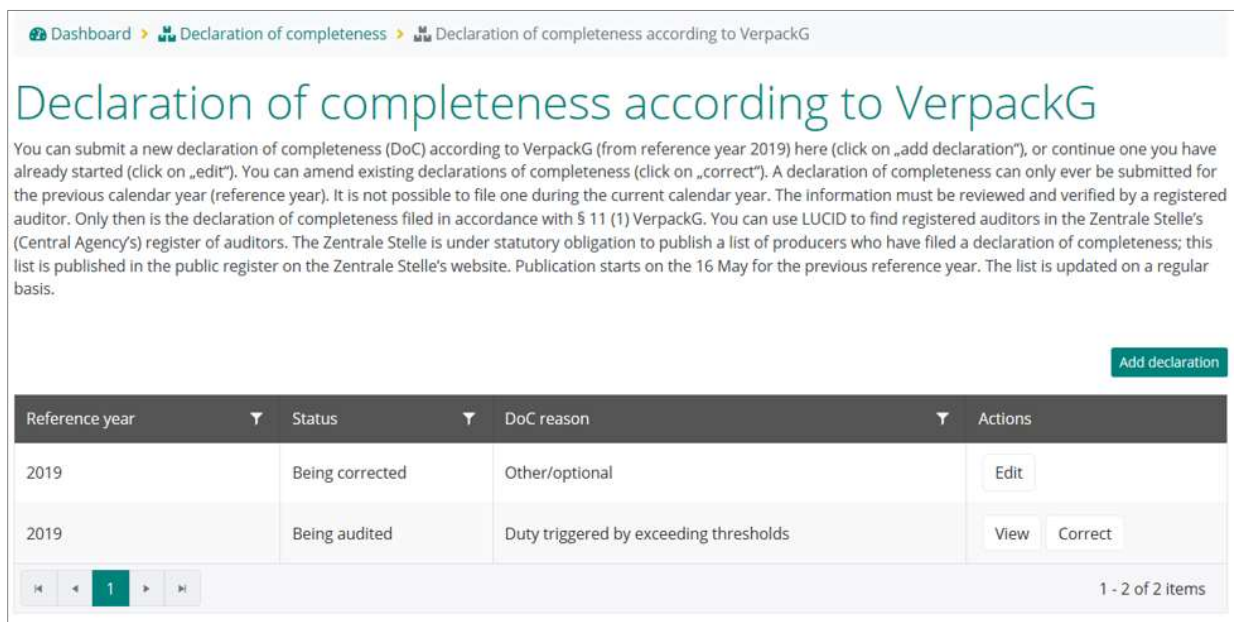


Figure 63 – Overview of declarations of completeness after resetting the audit

8 Document requirements

Documents will only be deemed filed if they can be opened by the ZSVR and their content can be displayed in a readable manner. The following requirements should be taken into account:

Document requirements to ensure machine readability

All of the filed documents must be machine readable using computer software. In this context, machine readability means that the computer can recognise the text contained in a picture and make it available for downstream processing. Documents that have been created directly using word processing software are machine readable per se. Documents that producers initially had on paper or only, as a scan of a printout, must be processed using so-called Optical Character Recognition (OCR) software to become machine readable. To make this possible, the following requirements

must be taken into account for documents that were generated by producers using word processing software and then submitted as an electronic document.

- ◆ Use of a 'standard' font type known in common Windows/Mac/Linux operating systems, such as Arial, Calibri, Times New Roman, Helvetica (list is not exhaustive).
- ◆ No use of so-called 'typewriter' font types, such as Courier (this means font types that look like earlier typewriters).
- ◆ Use of dark writing (preferably black) on a light background (preferably white).
- ◆ No colourful (or grayscale) backgrounds or graphics; if watermarks are used, the text should be clearly distinguishable (cf. examples 2 and 3).
- ◆ The font size in any part of the document (including footnotes) may be no smaller than 8 pt.
- ◆ Documents may not be handwritten.
- ◆ Documents may not have handwritten mark-ups.
- ◆ The minimum resolution for scans is 300 dpi or higher.
- ◆ Documents should be scanned or filed without creases, folds and/or seams (cf. example 4); if there are any creases, folds and seams, the document should be flattened before scanning.

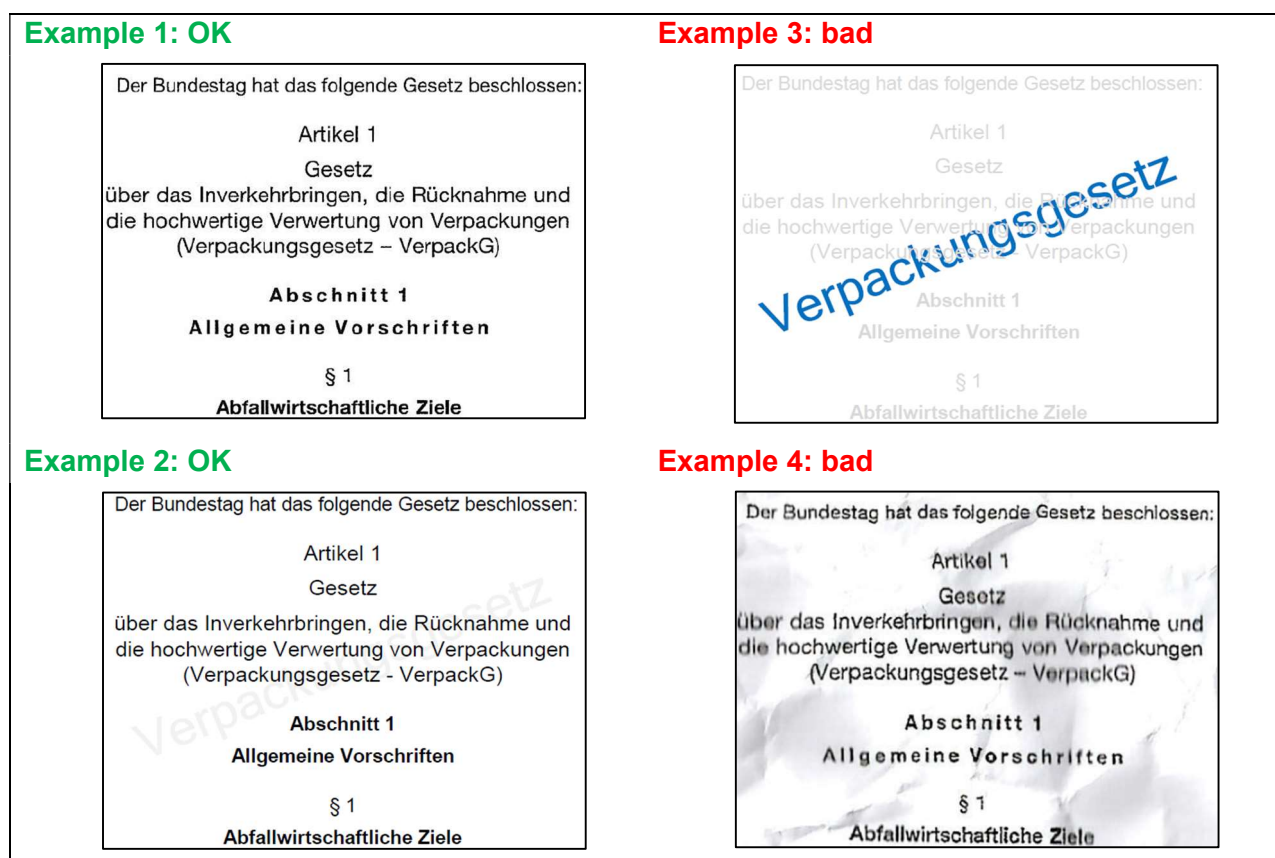


Figure 64 – Overview of machine readability

When creating the files, it should be noted that the length of the file name must not exceed 150 characters. Moreover, umlauts or special characters (except '.', '-' and '_') are not permissible in the file name.

9 Publication in the public register

Only once the DoC has been fully filed is the producer included in the public register in the DoC section. That means that all the documents requested for the submission of the DoC have been successfully filed and the auditor has not denied a confirmation pursuant to section 11 (1) VerpackG. If the confirmation was denied, there will be no inclusion in the public register.

The producers who filed a DoC will be published after 16 May for the previous reference year. The data is updated on a regular basis. This also applies for the DoCs that have been filed due to an order by the ZSVR / responsible state authorities or on a voluntary basis. Each publication is subject to further verification of content-related accuracy. No publication will be made for DoCs filed for the period between 2012 and 2017.

10 Qualified electronic signature

10.1 General information on the qualified electronic signature (QES)

General information on the qualified electronic signature

The qualified electronic signature (QES) is the equivalent of the traditional signature in the electronic world. It makes it possible to verify the authorship of a declaration in electronic data transfers over the long term. The qualified electronic signature is the legal counterpart to a handwritten signature.

In addition to a computer, laptop or similar device, a qualified certificate on a secure signature card, a chip card reader and corresponding signature software are needed to produce a qualified electronic signature. Alternatively, a remote signature using a mobile device and 2-factor authentication is possible.

The signature card anchored with a qualified certificate can be ordered from a qualified trusted services provider (trust service). The current list of trust services recognised by the EU Commission can be viewed online (<https://eidas.ec.europa.eu/efda/tl-browser/#/screen/home>). Certificates from these trust services are recognised in the European Economic Area.

Users identify themselves to the trust service and are then registered by the service. Digital signatures relate to a process whereby an additional data set – the so-called signature – is generated for each given digital file. Verification of the digital signature determines whether the signed data have been changed after the signature process. The author of the signature can also be determined during the verification process by reading the certificate. This certificate is secured by a trust service. The use of a password or PIN prevents an unauthorised third party from using the certificate.

10.2 Auditing the QES in LUCID

The DoC audit result is confirmed by registered auditors – as was the case under the Verpackungsverordnung when submitting the DoC to the DIHK – and signed with a qualified electronic signature (QES).

The ZSVR uses software that checks the integrity and authenticity of documents with a qualified electronic signature. Only QESs with certificates from trust centres recognised by the EU Commission will be accepted. To sign PDF documents, only the 'PAdES embedded' signature exchange format (PDF signature, *.pdf) is permitted.

To file the **audit confirmation**, the auditor fills out a form prescribed by the ZSVR in the 'Declaration of completeness audit guidelines' outside of LUCID (<https://www.verpackungsregister.org/en/foundation-authority/audit-guidelines/declaration-of-completeness>). The document is not sealed by the ZSVR. The auditor saves the document in PDF/A compatible format. They then sign it with a QES in the 'PAdES embedded' signature exchange format, and upload it in LUCID.

The **audit report** does not have to have a QES. If the auditor wishes to sign the audit report with a QES, they have to save the document in a PDF/A compatible way and use the 'PAdES embedded' signature exchange format. They then upload the file in LUCID. This QES is not checked.

10.3 Information about signing documents with a QES

- ◆ Documents must be signed with a qualified electronic signature. Advanced and simple signatures are not permitted.
- ◆ The automatically generated producer declaration bears the seal of the ZSVR and must not be altered. The auditor's signature must be added, to make sure that both signatures are embedded in the file.
- ◆ The signature card delivered by the trust service must be explicitly activated after receipt. Signatures from signature cards that have not been activated cannot be verified. If the signature card's validity period has expired, it can no longer be used to sign.
- ◆ The use of the 'PAdES embedded' signature exchange format is mandatory, and must be activated in the signature software used, as necessary.
- ◆ The signature software must be set up in such a way that the generated signature time is not in the future. Signature times in the future cannot be verified.
- ◆ Information stored in the signature is encrypted. the encryption method used for this purpose must comply with current requirements of the eIDAS Regulation.

11 Table of figures

Figure 1 – LUCID, producer dashboard, overview of all tiles	6
Figure 2 – Selection of the DoC type	6
Figure 3 – DoC tile, overview of DoCs	7
Figure 4 – Setting up a new DoC ('Add declaration')	7
Figure 5 – Fields to be updated when DoC [reference/reason] is 'Requirement from the responsible state authority'	8
Figure 6 – Fields when DoC reason is 'Order from the Stiftung Zentrale Stelle Verpackungsregister'	8
Figure 7 – Tile overview (DoC)	9
Figure 8 – Process for entering packaging subject to system participation & sector-specific solution volumes (DoC)	10
Figure 9 – Volumes input form (packaging subject to system participation)	11
Figure 10 – Deduction volumes	12
Figure 11 – Overview of review result of the previous entries	13
Figure 12 – Confirmation dialogue (saving message)	13
Figure 13 – Review result (warnings and messages)	14
Figure 14 – Process for entering sector-specific solution volumes (DoC)	14
Figure 15 – Volumes input screen (sector-specific solution)	15
Figure 16 – Process for entering non-private final consumer volumes (DoC)	16
Figure 17 – Input screen: Packaging: non-private final consumer	17
Figure 18 – Process for DoC submission	18
Figure 19 – Summary, filing and submission of the DoC	18
Figure 20 – Complete DoC filing confirmation dialogue	19
Figure 21 – DoC filing successful dialogue	19
Figure 22 – DoC confirmation e-mail with download link	20
Figure 23 – View DoC	20
Figure 24 – Filing a declaration of completeness (data not yet generated)	21
Figure 25 – Downloading a producer declaration (data generated)	21
Figure 26 – Producer declaration with the ZSVR's QES	22
Figure 27 – Overview of the tiles to file PDF documents	22
Figure 28 – Correcting a DoC	23
Figure 29 – Correct producer declaration warning message	23
Figure 30 – LUCID, dashboard of an appointed third party, all tiles	24
Figure 31 – Appointed third party: declarations of completeness	24
Figure 32 – LUCID DoC, managing declarations of completeness	25
Figure 33 – LUCID DoC, manage requests	25
Figure 34 – LUCID DoC, request details	26
Figure 35 – LUCID DoC, manage requests (updated status)	26
Figure 36 – Manage declaration of completeness, start actions	27
Figure 37 – Manage declaration of completeness, edit actions	27
Figure 38 – Overview of tiles for appointed third party DoCs	28
Figure 39 – Authorised representative's dashboard following login generation	28
Figure 40 – 'Manage producers' tile	29
Figure 41 – Producer dashboard access for authorised representatives	29
Figure 42 – Authorised representative's view of the producer dashboard	30
Figure 43 – DoC options for authorised representatives	30
Figure 44 – DoC options for producers with an active authorisation	31
Figure 45 – DoC filing overview	31
Figure 46 – LUCID dashboard (auditor view)	32

Last updated: 28 November 2023

Figure 47 – DoC status overview	32
Figure 48 – Overview of the tiles to submit PDF documents	33
Figure 49 – LUCID dashboard (producer), declaration of completeness	33
Figure 50 – Selection of the DoC type (producer)	34
Figure 51 – Declarations of completeness, edit	34
Figure 52 – Submitting the signed producer declaration	35
Figure 53 – Producer declaration upload	35
Figure 54 – Producer declaration upload (incl. possible error messages)	36
Figure 55 – Notification after successful file upload	36
Figure 56 – Submitting the signed audit confirmation	37
Figure 57 – Submitting the (signed) audit report	37
Figure 58 – Entering the audit result	37
Figure 59 – Confirmation of successful DoC submission	38
Figure 60 – DoC status	39
Figure 61 – 'Reset audit' tile overview	39
Figure 62 – Reset audit warning message	40
Figure 63 – Overview of declarations of completeness after resetting the audit	40
Figure 64 – Overview of machine readability	41