

# **BLUE ANGEL**

**The German Ecolabel**



**Reusable packaging systems for the sale of  
takeaway ("to-go") food and beverages**

**DE-UZ 210**

**Basic Award Criteria**

**Edition January 2025**

**Version 1**

**The Environmental Label is supported by the following four institutions:**



Federal Ministry  
for the Environment, Climate Action,  
Nature Conservation and Nuclear Safety

The Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection is the owner of the label. It regularly provides information on the decisions taken by the Environmental Label Jury.



The German Environmental Agency with its specialist department for "Ecodesign, Eco-Labeling and Environmentally friendly Procurement" acts as office of the Environmental Label Jury and develops the technical criteria of the Basic Criteria for Award of the Blue Angel.



The Environmental Label Jury is the independent, decision-making body for the Blue Angel and includes representatives from environmental and consumer associations, trade unions, industry, the trade, crafts, local authorities, academia, the media, churches, young people and the German federal states.



The RAL gGmbH is the awarding body for the Environmental Label. It organises the process for developing the relevant award criteria in independent expert hearings – which involve all relevant interest groups.

If you require further information please contact:

RAL gGmbH

**RAL UMWELT**

Fränkische Straße 7

53229 Bonn

Tel: +49 (0) 228 / 6 88 95 - 190

E-Mail: [umweltzeichen@ral.de](mailto:umweltzeichen@ral.de)

[www.blauer-engel.de](http://www.blauer-engel.de)

## Table of contents

1	Introduction.....	5
1.1	Preface .....	5
1.2	Background .....	5
1.3	Objectives of the Environmental Label .....	5
1.4	Definitions.....	6
2	Scope .....	7
3	Requirements .....	8
3.1	Description of the reusable packaging system .....	8
3.1.1	Information on the characteristics of the system .....	8
3.1.2	Information on the food and beverage vendors .....	9
3.1.3	Information on the events .....	10
3.2	Requirements for the reusable sales packaging (reusable containers) .....	10
3.2.1	Fitness for use .....	10
3.2.2	Service life .....	10
3.2.3	Material requirements .....	11
3.2.3.1	Plastics requirements .....	11
3.2.3.2	Ceramic requirements .....	12
3.2.3.3	Stainless steel .....	12
3.2.3.4	Renewable raw materials .....	12
3.3	Requirements for reusable packaging system providers.....	13
3.3.1	Deposit for the reusable sales packaging and lid .....	13
3.3.2	Reporting and calculating the circulation number.....	13
3.3.3	Recycling by type of material .....	14
3.3.4	Logistics.....	14
3.3.5	Handling of data.....	15
3.4	Requirements for the sale of food and beverages in reusable sales packaging .....	16
3.4.1	Compliance with the "Good Rules" by food and beverage vendors and at events .....	16
3.4.2	Checking compliance with the "Good Rules".....	16
3.5	Events .....	17
3.5.1	Printing for a specific event .....	17

3.5.2	Cleaning at events.....	17
3.6	Labelling .....	17
3.7	Outlook.....	18
4	Applicants and Parties Involved .....	19
5	Use of the Environmental Label .....	19
Appendix A	Calculation of the circulation number in the sense of these Basic Award Criteria	20
Appendix B	Good rules for the environmentally friendly sale of takeaway food and beverages .....	21
Appendix C	The German information sheet "Pool-Geschirr: Hygiene beim Umgang mit Mehrweggeschirren innerhalb von Pfand-Poolsystemen" (Pool crockery: Hygiene when handling reusable crockery in deposit pool systems") .....	23
Appendix D	The German information sheet "Coffee to go -Becher: Hygiene beim Umgang mit kundeneigenen Bechern zur Abgabe von Heißgetränken in Bedienung oder Selbstbedienung" (Hygiene when handling the customer's own cups for dispensing hot beverages in full-service or self-service) .....	23
Appendix E	The German information sheet "Mehrweg-Behälter: Hygiene beim Umgang mit kundeneigenen Behältern zur Abgabe von Lebensmitteln in Bedienung oder Selbstbedienung" (Reusable containers: Hygiene when handling the customer's own containers for dispensing hot food in full-service or self-service) .....	23
Appendix F	Literature, legal texts and standards.....	24

**This document is a translation of a German original. In case of dispute, the original document should be taken as authoritative.**

# **1 Introduction**

## **1.1 Preface**

In cooperation with the Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection, the German Environmental Agency and considering the results of the expert hearings conducted by RAL gGmbH, the Environmental Label Jury has set up these Basic Criteria for the Award of the Environmental Label. RAL gGmbH has been tasked with awarding the Environmental Label.

Upon application to RAL gGmbH and on the basis of a Contract on the Use of the Environmental Label to be concluded with RAL gGmbH, the permission to use the Environmental Label may be granted to all products, provided that they comply with the requirements as specified hereinafter.

The product must comply with all the legal requirements in the country in which it is to be marketed. The applicant shall declare that the product meets this requirement.

## **1.2 Background**

In 2022, the catering sector sold almost 14 billion meals and drinks in packaging (such as containers or cups). Yet less than one percent of this packaging was reusable (WWF & GVM 2023). At the turn of the year 2022/2023, Germany introduced an obligation to offer reusable packaging for takeaway food and drinks in the German Packaging Act (Verpackungsgesetz). Although a survey conducted in 2023 indicated that three quarters of those questioned had heard of this obligation to offer reusable packaging for takeaway food and drinks (WWF 2023), the takeaway and to-go sector is only switching over to reusable packaging very slowly: Reusable packaging accounted for just 1.6 percent of the market at the beginning of 2024 (WWF & GVM 2024).

This is despite the fact that it is well known that disposable packaging has a huge impact on the environment. Alongside the consumption of resources and the associated environmental impact, the high volume of waste also places an additional burden on municipal waste management companies. Another problem is the pollution caused by the careless littering of roads, parks or the countryside with disposable crockery and other waste.

Reusable packaging systems are an alternative to disposable packaging. These systems loan reusable sales packaging and their components from a pool of these items to food and beverage vendors, offer reusable lids and organise the delivery and return of used or damaged containers. The following factors have an influence on the environmental impact of reusable packaging systems: the return rate, processes to collect and distribute the packaging, cleaning processes, the type of material and weight of the packaging, end-of-life (durability and recyclability) and the production site (in order of decreasing relevance; Verburt, T. 2021). Among other things, it is these criteria that the Blue Angel focuses on in these Basic Award Criteria.

## **1.3 Objectives of the Environmental Label**

The objectives of the ecolabel are to reduce the amount of disposable sales packaging used for takeaway food and beverages and to promote environmentally friendly reusable packaging systems. The Basic Award Criteria place requirements on the containers themselves, the collection of relevant key data on the reusable packaging systems and on the utilisation of appropriate and adequate incentives for the use of reusable sales packaging.

The Blue Angel ecolabel may be awarded to reusable packaging systems featuring the following environmental and health aspects:

- Avoidance of materials that are harmful to the environment and health
- Avoidance of waste
- Long service life of the reusable sales packaging as a technical prerequisite for achieving high circulation numbers
- Reusable packaging systems with intelligent logistics

Therefore, following benefits for the environment and health are stated in the explanatory box:



## 1.4 Definitions

**Food and beverage vendor:** This term covers all establishments that sell ready-to-consume beverages and/or food in reusable sales packaging, such as catering establishments, system catering companies, communal catering companies and the retail trade (including partner companies). A vendor or partner company can operate multiple points of sale, e.g. branches.

**Takeaway sales:** The sale of food and beverages for consumption in another location, irrespective of whether the order is made in person, by telephone, online or via a third party (e.g. a delivery service).

**Individual cup:** An individual cup is purchased by the customer. When dispensing the beverage, this cup can be filled in accordance with certain hygiene measures. The cup remains in the possession of the customer and must be cleaned by the customer themselves. Individual cups do not lie within the scope of these Basic Award Criteria.

**Reusable packaging system:** A reusable packaging system is a service that loans reusable sales packaging and their components<sup>1</sup> from a pool of these items to food and beverage vendors, offers reusable lids and organises the delivery and return of used or damaged containers.

**Reusable packaging system provider:** A provider of reusable sales packaging and their components within a loan system for food and beverage vendors and all other interested parties so that they can fulfil the obligation to offer reusable packaging for takeaway food and drinks (according to the German Packaging Act (VerpackG)).

---

<sup>1</sup> see the German Packaging Act, Annex 1, Point 1

**Reusable sales packaging and their components:** A reusable container or receptacle with a lid and other components that are used as sales packaging for ready-to-consume hot and cold meals / food and drinks. The reusable packaging is loaned to customers in exchange for a deposit (see below). The container remains the property of the reusable packaging system provider.

**Deposit (in the sense of these Basic Award Criteria):** A security payment for the temporary loan of the reusable sales packaging. The deposit should provide consumers with a suitable incentive to use the reusable sales packaging and promptly return it to the system. The deposit can be collected when issuing the reusable container by e.g. directly charging an amount of money within a token or card-based system that is then repaid when the container is returned. The customer's payment data can also be stored and a contractually agreed amount will be charged if the container is not returned within a set period of time (indirect security payment).

**Pool:** The number of functional pieces of reusable sales packaging within a reusable packaging system, e.g. annually (number on a reporting date, plus any pieces of reusable sales packaging added during the last calendar year).

**Partner companies** can also be several companies within a franchise model or independent companies organised within a chain under the same name.

**Return point:** A location or facility where the containers can be taken back by food and beverage vendors and fed into the logistics process (washing, preparation, removal, etc.).

**Return rate:** The ratio of the pieces of reusable sales packaging issued to customers by food and beverage vendors to the number of returned containers (returned by the customers to the food and beverage vendor) within a certain period of time, e.g. annually.

**Circulation time:** The length of the full cycle for one single container, i.e. the average time it takes from issuing the container to a customer until it is ready to be issued to a new customer.

**Circulation number (in the sense of these Basic Award Criteria):** The circulation number for reusable sales packaging in the sense of these Basic Award Criteria is a statistical value for the total number of pieces of reusable sales packaging issued by food and beverage vendors that are returned by customers to the food and beverage vendors or removed from the system. Appendix A defines the circulation number in the sense of these Basic Award Criteria.

## 2 Scope

The DE-UZ 210 ecolabel applies to reusable packaging system providers that offer reusable sales packaging and their components to more than one partner company for the sale of takeaway food and beverages in exchange for a deposit (see definitions).

Holders of the ecolabel can also be companies who actively sell takeaway food and beverages (so-called food and beverage vendors). The following food and beverage vendors are entitled to hold the ecolabel:

- Organisers of large events (including stadium operators, trade fair operators, etc.) with various points of sale, e.g. stands
- Supra-regional chains, e.g. petrol stations, bakeries (with at least 25 return points)
- System catering companies and retail companies with a large number of branches (with at least 25 return points)
- Communal catering services, e.g. canteens, student cafeterias, etc.
- Companies that provide ambulant food services ("meals on wheels")

Individual cups, reusable containers in which food is packaged for a long period of time and reusable bottles for beverages are excluded from the scope of these Basic Award Criteria.

### **3 Requirements**

Depending on the type of applicant (reusable packaging system provider or a company or event organiser who actively sells takeaway food and beverages), it is necessary to comply with different criteria. In some cases and where specifically indicated below, the applicant must also submit different verifications of their compliance with the criteria:

- The criteria in Paragraphs 3.1 and 3.2 apply to all applicants, whereby the material requirements (Paragraph 3.2.3) only apply to the relevant material used in each case.
- The criteria in Paragraphs 3.3.1 and 3.3.4 apply to all applicants. The criterion in Paragraph 3.3.5 only applies to certain applicants.
- The criteria in Paragraph 3.4 apply to all applicants.
- The criteria in Paragraph 3.5 only apply to reusable packaging system providers if the reusable packaging system is used for events. They also apply to event organisers but are not relevant for food and beverage vendors outside of events

#### **3.1 Description of the reusable packaging system**

##### **3.1.1 Information on the characteristics of the system**

The applicant must provide the following data on the characteristics of the reusable packaging system:

- Date that the reusable packaging system was launched
- Type of system, i.e. event or stationary system
- The types of reusable sales packaging made of the same material in the reusable system and their filling volumes, according to container category. The container categories are:
  - a) A cup with a separate lid
  - b) A round bowl with a separate lid (without a central divider)
  - c) A square container with a separate lid (without a central divider)
  - d) A square container with an integrated lid, e.g. for burgers, chips or fries, etc.
  - e) A round or square container with a central divider
  - f) Pizza boxes
- The proportions of these containers supplied to each category of food and beverage vendor. The categories of food and beverage vendor are:
  - ♦ Chains such as petrol stations, bakeries and system catering companies
  - ♦ Individual catering companies/café's and bakeries with less than 6 branches
  - ♦ Individual companies or supermarkets



- ♦ Communal catering services, e.g. canteens, student cafeterias, etc.
- ♦ Companies that provide ambulant food services ("meals on wheels")
- ♦ Other
- ♦ *For events: The number of stands that sell food and/or beverages in reusable packaging, if relevant.*
- The proportion of partner companies that deliver reusable sales packaging to customers at home (using delivery services)
- The proportion of the pool of sales packaging that can be returned using reverse vending machines (specifically designed for the return of empty packaging).
- Information on the average circulation time for a single container, if this is available and can be calculated (e.g. using digital systems); if there are large deviations in the circulation times for different categories of container, the information should be broken down by category.
- Average return rate
- Proportion of the sites operated by food and beverage vendors in each location (large city > 100,000 inhabitants - small/medium-sized town 5000 - 99,999 inhabitants - rural area < 4,999 inhabitants)
- Proportion of the sites operated by food and beverage vendors (for events: number of stands) that wash the containers centrally or locally.
- A description (short text) of how the data described above was collected.

### **Compliance verification**

*The applicant shall declare in Annex 1 that he/she has collected all of the required data and submit this data in Annex 1. The applicant shall also submit a description of how the data was collected. If the values for the above-mentioned data points change by more than 5% across the entire pool, the applicant shall submit updated information after the award of the ecolabel on an annual basis by 1 May of the following year in Annex 3. This also applies if there is a change to the type of system, e.g. the system is now also used in the event sector. If the values for the above-mentioned data points do not change by more than 5%, the label holder shall submit confirmation that this is the case.*

*Applicants that submit their initial application between January and 1 May of a calendar year are exempt from the reporting obligation for that year.*

#### **3.1.2 Information on the food and beverage vendors**

At the time of the application, the reusable packaging system provider must submit a list of the food and beverage vendors that it supplies with deposit containers.

After the award of the ecolabel, the label holder must submit an updated list every year by 1 May at the latest. This list must document the food and beverage vendors supplied with deposit containers in the preceding calendar year.

### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1 and submit a list of food and beverage vendors that it supplies, including the number of pieces of reusable sales packaging and, if relevant, their components supplied to each one. Every year, the applicant shall submit an updated list for the preceding calendar year by 1 May at the latest. Applicants*

*that submit their initial application between January and 1 May of a calendar year are exempt from the reporting obligation for that year.*

### **3.1.3 Information on the events**

At the time of the application, the reusable packaging system provider must submit a list of events that it supplies with reusable sales packaging. After the award of the ecolabel, the label holder must submit an updated list every year by 1 May at the latest. This list must document the events supplied with reusable sales packaging in the preceding calendar year.

#### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1 and submit a list of events that it supplies, including the number of pieces of reusable sales packaging and, if relevant, their components supplied to each one. The applicant shall also state which events were single-day or multi-day events. Every year, the applicant shall submit an updated list for the preceding calendar year by 1 May at the latest. Applicants that submit their initial application between January and 1 May of a calendar year are exempt from the reporting obligation for that year.*

### **3.2 Requirements for the reusable sales packaging (reusable containers)**

Unless stated otherwise, the following requirements apply to all of the reusable sales packaging and their relevant components, especially the lids.

#### **3.2.1 Fitness for use**

- The reusable sales packaging must comply with the statutory regulations in Regulation (EC) No 1935/2004 on "materials and articles intended to come into contact with food".
- The reusable sales packaging must be heat resistant and retain its shape even at extreme temperatures of 0 and 85°C.

#### **Compliance verification**

*The applicant shall declare compliance with the above-mentioned requirements in Annex 1 and submit confirmation from a testing laboratory accredited according to DIN EN ISO/IEC 17025 to certify that the packaging and lid comply with the above-mentioned requirements. In addition, RAL can request a copy of the associated test report.*

#### **3.2.2 Service life**

The container must have a service life of at least 500 wash cycles. Reusable lids must have a service life of at least 100 wash cycles. If the containers or lids are printed, their imprint must also have the same service life for the wash cycles stated above. When testing containers with a lid, the test report must confirm that the lid still fits the container after the washing test.

#### **Compliance verification**

*The applicant shall declare compliance with the requirement in Annex 1 and submit the test report from a testing laboratory. The results should be given using a rating scale of 1 (very good)*

to 6 (very poor). Ratings of  $\leq 3$  will be accepted. The report must contain information on how the washing cycles were measured, including the type of dishwasher, the washing cycle and its minimum and maximum washing temperatures and photos of the tested container and lid both before and after the test.

*If the system provider offers several different types of reusable sales packaging with different filling volumes, they must be divided into groups based on the categories of container types and filling volumes (a-f) in Paragraph 3.1.1. and a container with the most unfavourable surface/volume ratio in each group should be tested as an example. If a new type of reusable sales packaging is added to the system and does not fit into any of the stated categories, a new test report must be submitted.*

### **3.2.3 Material requirements**

#### **3.2.3.1 Plastics requirements**

If the reusable sales packaging and their components, especially the lids, are made of plastic, the following applies:

- The reusable sales packaging and their components relevant for the system, especially the lids, must not
  - ♦ be made out of plastics containing polycarbonate or melamine
  - ♦ contain any perfluorinated and polyfluoroalkyl substances (PFAS)
- The reusable sales packaging must be made of unmixed plastic (mono-material) for which a recycling system has already been established, without being coated with any other materials that would prevent it being recycled.
- The reusable sales packaging must not be equipped or combined with fillers, additives and other materials that prevent material recycling, e.g. silicone or fibreglass reinforcement.
- The reusable sales packaging and their components, especially the lids, must be food-safe and tasteless in accordance with Regulation (EU) 10/2011 on "plastic materials and articles intended to come into contact with food".

#### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1 and submit a test report from a testing laboratory accredited according to DIN EN ISO/IEC 17025 to verify compliance with Regulation (EU) 10/2011. The applicant shall also submit confirmation from the manufacturer in Annex 2 to verify compliance with the minimum standards for the recyclability of packaging (in accordance with §21 of VerpackG) and the material composition of the reusable sales packaging and their components relevant for the system, especially the lids. Deviations from the minimum standards may be accepted if additional verifications are provided, e.g. automated NIR sorting is not necessarily required as an evaluation criterion within the applicant's own return logistics. All other requirements in the minimum standards remain valid.*

### 3.2.3.2 Ceramic requirements

If the reusable sales packaging and their components relevant for the system, especially the lids, are made of ceramic (e.g. porcelain), the following applies:

- The applicant must verify that the ceramic was manufactured using the best available techniques as defined in the BAT reference document for the ceramic industry<sup>2</sup>.
- The applicant must submit a test report with the results of a migration test carried out in accordance with the German Consumer Goods Ordinance (BedGgstV).

#### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1 and submit confirmation from a testing institution accredited in accordance with DIN EN ISO/IEC 17025 including the results of the migration test carried out in accordance with BedGgstV. Upon request by RAL gGmbH, the applicant shall submit suitable test reports when submitting the application, or whilst using the label, that verify compliance with the limit values for dust emissions, waste water, energy consumption and the use of chemicals specified in the BAT reference document as well as the process management system. RAL gGmbH will only request this information if there are reasonable doubts regarding compliance with this requirement. Test reports must be submitted no later than three months after the request.*

### 3.2.3.3 Stainless steel

If the reusable sales packaging and their components relevant for the system, especially the lids, are made of stainless steel, the following applies:

The applicant must verify that the stainless steel is suitable for use as food packaging in accordance with the technical guide "Metals and alloys used in food contact materials and articles"<sup>3</sup>.

#### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1 and submit confirmation from a testing institution accredited according to DIN EN ISO/IEC 17025 about the suitability of the material in accordance with the technical guide "Metals and alloys used in food contact materials and articles"<sup>3</sup>.*

### 3.2.3.4 Renewable raw materials

If renewable raw materials are used in the production of the containers and/or lids, they must be sourced from sustainable agriculture/forestry.

#### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1 and submit a certificate to verify the sustainable origin of the raw materials (e.g. FSC Mix Credit or FSC 100%, 100%*

---

<sup>2</sup> Reference Document on Best Available Techniques in the Ceramic Manufacturing Industry, August 2007, [https://eippcb.jrc.ec.europa.eu/sites/default/files/2019-11/cer\\_bref\\_0807.pdf](https://eippcb.jrc.ec.europa.eu/sites/default/files/2019-11/cer_bref_0807.pdf)

<sup>3</sup> European Directorate for the Quality of Medicines & HealthCare of the Council of Europe (EDQM) (2024): Metals and alloys used in food contact materials and articles, 2nd Edition, <https://www.edqm.eu/en/metals-and-alloys-used-in-food-contact-materials-and-articles>

*PEFC, International Sustainability and Carbon Certification (ISCC+), Roundtable on Sustainable Biomaterials (RSB), Roundtable Responsible Soy (RTRS), Roundtable on Sustainable Palm Oil (RSPO), GOTS or an equivalent certificate)*<sup>4</sup>.

### **3.3 Requirements for reusable packaging system providers**

#### **3.3.1 Deposit for the reusable sales packaging and lid**

The reusable packaging system providers must obligate the food and beverage vendors to only issue the reusable sales packaging to customers in exchange for an appropriate deposit (see definitions). The deposit must be at least 1 Euro.

If a lid is offered for the reusable sales packaging, the provider of the reusable packaging system must provide a suitable reusable lid for the food and beverage vendor. The reusable lids are part of the reusable packaging system and must be returned. The vendor is not permitted to sell them. The use of disposable lids is not permitted.

#### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1. To verify the use of a deposit system, the applicant shall enclose the corresponding passage about the deposit fee in the contract concluded between the applicant and the food and beverage vendor.*

#### **3.3.2 Reporting and calculating the circulation number**

The reusable packaging system provider must report the following data:

- The total pool of packaging in the reusable packaging system (all containers that have ever been placed into circulation in the system) with the proportions in each of the categories (a - f) of container types and filling volumes from Paragraph 3.1.1
- The number of pieces of reusable sales packaging in circulation in the system each year, broken down by category (a - f) of container types and filling volumes from Paragraph 3.1.1
- An assessment and information on whether the key variables named in this criterion can also be used for lids and which variables have different values for lids and containers.

#### **Data for calculating the circulation number**

- The total pool of packaging (the number of functional containers on 1 January of a calendar year, plus the number of new containers placed into circulation in the same calendar year)
- The number of containers issued in the last calendar year (to customers by the food and beverage vendor)
- The number of returned containers in the last calendar year (to the food and beverage vendor by customers; see return ratio)
- The number of containers removed from the system in the last calendar year

The label holder must use the formula stated in Appendix A to calculate the circulation number. In addition, the label holder should also report other alternative circulation numbers if they are available to the label holder, e.g. from digital recording processes.

---

<sup>4</sup> This list of certificates was taken from Henneberg et al. (2019)

### **Compliance verification**

*The applicant shall declare in Annex 1 that he/she has collected all of the required data and submit this data including the circulation number (calculated according to Appendix A) annually by 1 May of the following year at the latest in Annex 1.*

*The data can also be collected with the assistance of third parties (e.g. a trustee), using statistical procedures or by extrapolation from a limited number of datasets. The companies in which data is recorded for the extrapolation process and their sites and categories (see "The proportions supplied to partner companies") must be stated in Annex 2b. The following minimum requirements apply when extrapolating the data:*

- *The minimum number of datasets required is based on the number of points of sale, whereby at least 5% is required up to 6000 points of sale. System operators with > 6000 points of sale must only collect data for a maximum of 300 points of sale.*
- *The points of sale where the data is collected must correspond to the proportions of partner companies in rural areas, small/medium-sized towns and large cities (representative distribution)*
- *Selection of companies from various different categories (see "The proportions supplied to partner companies"), if relevant*
- *Minimum time period for collecting the data from the points of sale: at least 6 months*

### **3.3.3 Recycling by type of material**

The reusable sales packaging must be taken back by the reusable packaging system provider at the end of its service life and sent for high-quality (mechanical) recycling. The label holder must have a concept for returning old containers and sending them for recycling and must submit a description of the structures and transfer points/interfaces for returning the old containers.

### **Compliance verification**

*The applicant shall declare in Annex 1 that*

*(1) he/she has the sorting and recycling infrastructures to enable the high-quality recycling of the reusable packaging and their components*

*(2) the components and any elements made of other materials can be separated and sorted from one another*

*(3) none of the packaging components or substances in the packaging material are unable to be recycled or could hinder the success of the recycling concept in practice*

*The applicant shall submit a description of the return system and annual data on old containers by type of material (e.g. the total amount of packaging removed (in t or pieces), the amount of reprocessed containers (in t or pieces) and the amount of packaging sent for recycling (in t or pieces)).*

### **3.3.4 Logistics**

The reusable packaging system provider must have a logistics concept that contains information on at least the following aspects:

- Transport routes, transport vehicles, e.g. e-mobility, information on average transport distances, the average utilisation of the transport vehicles and, if relevant, a description of transport collaborations
- Description of the take back process, e.g. with respect to reverse vending machines or take back collaboration schemes
- Description of the washing facilities and processes; including the location(s) of the washing equipment (for central facilities); if possible, information on typical dishwashers, the washing temperatures and the washing cycles
- Information on optimising the circulation of the reusable packaging system, especially on lowering the circulation time and reducing the proportion of lost packaging or packaging removed from the system<sup>5</sup>
- An action plan and strategy to optimise and improve the sustainability of the logistics concept over the next 5 years.

### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1 and submit the logistics concept containing at least the content described above.*

#### **3.3.5 Handling of data**

If the applicant operates a website or app that collects personal data and/or user-related data on customers, the following requirements apply:

- The label holder must state in its privacy policy whether personal data and/or user-related data on customers is collected, processed and transmitted for the operation and further optimisation of the reusable packaging system.
- The transmission and use of personal data and/or user-related data on customers by third parties (e.g. for data-driven business models at these third parties) is only permitted in aggregated or pseudonymous form.
- If the label holder offers digital services to end customers, he/she must also implement data economy and data minimisation measures (e.g. a cookie and tracking policy, access rights to the app, etc.).
- Digital applications (apps) offered by the licence holder must be free of advertising.

### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1 and submit its privacy policy and a declaration about the data economy and data minimisation measures that have been implemented.*

---

<sup>5</sup> These are the two key parameters for optimising the circulation number (Bick et al. 2024)

### **3.4 Requirements for the sale of food and beverages in reusable sales packaging**

#### **3.4.1 Compliance with the "Good Rules" by food and beverage vendors and at events**

The reusable packaging system provider undertakes to provide the following information to the food and beverage vendors that it supplies with reusable sales packaging:

- The guidelines "Good rules for the environmentally friendly sale of takeaway food and beverages" (Appendix B)
- The German information sheet "Pool-Geschirr: Hygiene beim Umgang mit Mehrweggeschirren innerhalb von Pfand-Poolsystemen" (Pool crockery: Hygiene when handling reusable crockery in deposit pool systems") issued by the Food Federation Germany (Appendix C)
- For the hygienic filling of individual cups, the German information sheet "Coffee to go - Becher: Hygiene beim Umgang mit kundeneigenen Bechern zur Abgabe von Heißgetränken in Bedienung oder Selbstbedienung" (Coffee-to-go cups: Hygiene when handling the customer's own cups for dispensing hot beverages in full-service or self-service) issued by the Food Federation Germany (Appendix D)
- The German information sheet "Mehrweg-Behälter: Hygiene beim Umgang mit kundeneigenen Behältern zur Abgabe von Lebensmitteln in Bedienung oder Selbstbedienung" (Reusable containers: Hygiene when handling the customer's own containers for dispensing hot food in full-service or self-service) issued by the Food Federation Germany (Appendix E)
- Information on improving the return rate (specific guidance from the provider)

All food and beverage vendors or events that use the reusable sales packaging supplied by the reusable packaging system provider for hot beverages or food or who are licence holders of the ecolabel themselves as an organiser must comply with the rules in Appendices B, C, D and E.

#### **Compliance verification**

*If the applicant is a reusable packaging system provider, he/she shall submit a sample contract concluded with its food and beverage vendors. It must be agreed in the contract that the food and beverage vendor will be provided with the stated information and will implement the rules and guidelines in practice in the best way possible.*

*If the applicant is a food and beverage vendor that uses its own reusable sales packaging and therefore functions both as a food and beverage vendor and as a reusable packaging system provider, the applicant shall declare in Annex 1 that he/she complies with the rules and processes at all of its points of sale.*

#### **3.4.2 Checking compliance with the "Good Rules"**

The reusable packaging system provider must check compliance with the "Good Rules" (Appendix B) by the food and beverage vendors (e.g. by carrying out spot checks, using secret customers, surveying users).



### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1 and submit a report on the measures to check compliance with the "Good Rules" that includes the following information: Any associated collection methods, any assumptions used for extrapolating data (if relevant), the results, conclusions on compliance with the rules ("The Good Rules are never / rarely / often / almost always / always implemented by the food and beverage vendors").*

## **3.5 Events**

The following criteria are only relevant for reusable packaging system providers if the reusable packaging system is used at events.

### **3.5.1 Printing for a specific event**

The reusable sales packaging, including their components, must either be unprinted or have neutral printing. They must not have unique printing for a one-off event, i.e. no dates and no logos for sponsors and no slogans that change between events. Logos that do not change across recurring events are permitted as long as they comply with the above-mentioned criteria.

### **Compliance verification**

*The applicant shall declare compliance with the requirements in Annex 1 and submit pictures of the reusable sales packaging (including all of their components) on which the printing is visible.*

### **3.5.2 Cleaning at events**

If they are used at multi-day events, the containers and, if relevant, their lids must be cleaned within a maximum radius of 100 km and used multiple times at the events.

### **Compliance verification**

*If the applicant is a reusable packaging system provider who supplies its reusable sales packaging to food and beverage vendors for an event as a service, the reusable packaging system provider shall submit a sample contract concluded with its food and beverage vendors. It must be agreed in the contract that the food and beverage vendor will comply with the above-mentioned requirements.*

*If the applicant is a food and beverage vendor that uses its own reusable sales packaging, the applicant shall declare in Annex 1 that he/she complies with the above-mentioned requirements at all of its points of sale and at all events.*

## **3.6 Labelling**

The reusable sales packaging and their components relevant for the system, especially the lids, must be labelled so that they can be unambiguously assigned and returned to their reusable packaging system provider.

The following sentence should be printed when advertising the certified reusable packaging system on e.g. displays, flyers or the website of the system provider: "This reusable packaging system is certified with the Blue Angel ecolabel for reusable packaging systems for the sale of takeaway ("to-go") food and beverages (Edition/Version of UZ 210)".

The reusable sales packaging itself can also be labelled. If the Blue Angel logo is used on the reusable sales packaging, a short link ([www.blauerengel.de/uz210](http://www.blauerengel.de/uz210)) and the issue date 01/2025 must be printed next to the logo.

### **Formulation for continued use after expiry of the ecolabel**

If the Basic Award Criteria are revised, any packaging labelled with the now expired Blue Angel ecolabel can still be used within the reusable packaging system. The packaging labelled with the expired Blue Angel ecolabel will be removed from the system later on during normal operations at the end of its service life and sent for recycling. By labelling the packaging with the version number and the issue date, it makes it possible to differentiate between packaging with valid and invalid certification.

### **Compliance verification**

*The applicant shall declare compliance with the requirement in Annex 1 and submit a sample of the container and, if applicable, the lid for each of the categories (a - f) of container types and filling volumes from Paragraph 3.1.1 to verify compliance with the requirement.*

*In addition, the applicant shall submit an image/photo of the packaging, the packaging design or a template for the product label to verify that the labelling of the certified reusable packaging system complies with the required elements of the labelling requirements.*

## **3.7 Outlook**

It is recommended that the following criteria are examined for inclusion in a future revision of these Basic Award Criteria:

- Requirements for the recycled content of reusable sales packaging
- An examination and, if relevant, definition of an indicator for assessing the environmental value added of the system, while taking into account the minimum requirement defined at an EU level for various packaging formats as part of the implementation of the EU Packaging Regulation
- A minimum size for the pool and minimum requirements for the number of return points
- Requirements for the resource conserving cleaning of the reusable containers by the food and beverage vendors and reusable packaging system providers, e.g. with respect to the use of energy efficient dishwashers and green electricity. The cost-benefit ratio should also be examined when developing a potential criterion. This requirement must differentiate between central and local washing processes and the influence that the applicants can have, as well as their ability to control and verify compliance with the requirement.
- Requirements for suppliers of the containers (e.g. geographical sources)
- Examining whether it is possible to promote open pool systems

## **4 Applicants and Parties Involved**

Reusable packaging system providers or food and beverage vendors according to Paragraph 2 shall be eligible for application as a label holder.

Parties involved in the award process are:

- RAL gGmbH to award the Blue Angel Environmental Label,
- the federal state being home to the applicant's production site,
- Umweltbundesamt (German Environmental Agency) which after the signing of the contract receives all data and documents submitted in applications for the Blue Angel in order to be able to further develop the Basic Award Criteria.

## **5 Use of the Environmental Label**

The use of the Environmental Label by the applicant is governed by a contract on the use of the Environmental Label concluded with RAL gGmbH.

Within the scope of such contract, the applicant undertakes to comply with the requirements under Paragraph 3 while using the Environmental Label.

Contracts on the Use of the Environmental Label are concluded to fix the terms for the certification of products under Paragraph 2. Such contracts shall run until December 31, 2028.

They shall be extended by periods of one year each, unless terminated in writing by March 31, 2028 or March 31 of the respective year of extension.

After the expiry of the contract, the Environmental Label may neither be used for labelling nor for advertising purposes. This regulation shall not affect products being still in the market.

The applicant (manufacturer) shall be entitled to apply to RAL gGmbH for an extension of the right to use the ecolabel on the product entitled to the label if it is to be marketed under another brand/trade name and/or other marketing organisations.

The Contract on the Use of the Environmental Label shall specify:

- Label holder (reusable packaging system provider/food and beverage vendor)
- Brand/trade name, product description
- Distributor (label user), i.e. the above-mentioned marketing organisations.

© 2025 RAL gGmbH, Bonn

## Appendix A Calculation of the circulation number in the sense of these Basic Award Criteria

A provisional figure for the circulation number is always defined when operating a reusable packaging system and should not be confused with the threshold value for the environmental viability of the system that is derived in an environmental assessment. There are various calculation methods for determining the circulation number that produce different results. There are also many different factors that have an influence on reusable packaging systems. In general, the higher the circulation number, the more environmentally friendly the system is.

The circulation number in the sense of these Basic Award Criteria is calculated as follows:

$$\text{Umlaufzahl im Sinne dieser Vergabekriterien} = \frac{1}{(1 - \text{Rückgabequote}) + \text{Aussonderungsquote}}$$

The term "1 - return rate" reflects the loss rate.

$$\text{Rückgabequote} = \frac{\text{Anzahl zurückgegebener Gefäße pro Jahr}}{\text{Anzahl ausgegebener Gefäße pro Jahr}}$$

$$\text{Aussonderungsquote} = \frac{\text{Ausgesonderte Gefäße pro Jahr}}{\text{Gesamtheit des Pools pro Jahr}}$$

- Removal = packaging removed from circulation due to breakage, defects and aesthetic or functional reasons, etc.
- Issued containers = the containers issued to customers by the food and beverage vendors
- Returned containers = the containers returned to the food and beverage vendor by customers
- The total pool of packaging per year = the number of functional containers on 1 January of a calendar year, plus the number of new containers placed into circulation in the same calendar year

## **Appendix B Good rules for the environmentally friendly sale of takeaway food and beverages**

### **a) Good practice: Deposit containers instead of disposable containers!**

Disposable containers produce a lot of waste and have a high environmental impact due to their large volume. Therefore, always offer your customers their food or beverage in reusable packaging first. Politely inform your customers about your reusable packaging system. Only provide disposable packaging if this is expressly requested by the customer because every piece of disposable packaging saved benefits the environment.

### **b) A lid for every pot**

It is not just disposable packaging that produces a lot of waste but also the disposable lids. Therefore, you must also offer your customers appropriate reusable lids for the disposable packaging. The lids – just like the reusable packaging – must be made out of environmentally friendly materials that comply with the Blue Angel criteria.

### **c) Everything has its price**

Unnecessary disposable packaging should also come with a “surcharge”. Therefore, it is important to create incentives for beverages and food served in disposable packaging or in the customer's own container. This can be achieved for instance by using a discount system or by levying an actual surcharge for beverages or food served in disposable packaging. We recommend that you explain to the customer that this surcharge is a kind of “environmental surcharge” due to the environmental impact of the disposable packaging.

### **d) Frequent use helps the environment!**

The more often a container is used, the better it is for the environment! This is because every time reusable packaging is used it saves one piece of disposal packaging. To ensure that you know how often a piece of reusable packaging has been used, it is important to calculate its circulation number. For this purpose, you or the provider of your reusable packaging system require information about the number of beverages or food served in the reusable packaging. We recommend that you assign your own registration number to beverages and food served in reusable packaging in your cash register system. This will enable you to inform the provider of the reusable packaging system about the number of beverages or food served in the reusable packaging and support the provider in preparing its statistics on the circulation numbers.

Please note: If you are concerned about passing on these figures to your provider of the reusable packaging system, you can also provide these figures for multiple locations (in the case of several food and beverage vending operations) or have them anonymously transmitted to your provider of the reusable container system via an independent third party.

### **e) Recycling at the end**

To ensure that you act sustainably right up to the very end of their service lives, you are obligated to take back all reusable packaging and, where relevant, reusable lids – even the damaged ones. These should then be returned to your reusable packaging system provider for recycling or you should recycle them yourself (as a provider of your own reusable packaging system).

**f) Demonstrate that the environment is important to you**

If you comply with all the rules listed here, you should also let people know about it: Use the "Blue Angel" advertising materials. Show your customers that the responsible use of our resources is important to you and that you are committed to serving beverages and/or food in an environmentally friendly way.

**g) Less is more**

The less waste the better: Therefore, reusable packaging must not be provided with additional sleeves (e.g. as heat protection or advertising media).

**h) Another good solution: Filling the customer's own cup or container**

Some customers already use their own individual, reusable cups for their "coffee-to-go" and their own containers for food. This is great for the environment! The following is thus a requirement for the Blue Angel at all points of sale: you must fill the customer's own cup or container if they are hygienic. In this context, observe the hygiene sheet issued by the Food Federation Germany.<sup>6</sup>

---

<sup>6</sup> Download it in German at [Hygiene beim Umgang mit Mehrweg-Bechern, -Behältnissen und -Geschirr: Hinweise für Servicekräfte - Lebensmittelverband Deutschland \(Hygiene when handling reusable cups, containers and crockery: Information for service personnel – Food Federation Germany\)](#)

**Appendix C The German information sheet “Pool-Geschirr: Hygiene beim Umgang mit Mehrweggeschirren innerhalb von Pfand-Poolsystemen” (Pool crockery: Hygiene when handling reusable crockery in deposit pool systems”)**

Download the information sheet issued by the Food Federation Germany at <https://www.lebensmittelverband.de/de/medien/publikation/merkblatt-pool-geschirr>

**Appendix D The German information sheet “Coffee to go -Becher: Hygiene beim Umgang mit kundeneigenen Bechern zur Abgabe von Heißgetränken in Bedienung oder Selbstbedienung” (Hygiene when handling the customer's own cups for dispensing hot beverages in full-service or self-service)**

Download the information sheet issued by the Food Federation Germany at <https://www.lebensmittelverband.de/de/medien/publikation/merkblatt-coffee-to-go>

**Appendix E The German information sheet “Mehrweg-Behältnisse: Hygiene beim Umgang mit kundeneigenen Behältnissen zur Abgabe von Lebensmitteln in Bedienung oder Selbstbedienung” (Reusable containers: Hygiene when handling the customer's own containers for dispensing hot food in full-service or self-service)**

Download the information sheet issued by the Food Federation Germany at <https://www.lebensmittelverband.de/de/medien/publikation/merkblatt-mehrweg-behaeltnisse>

## **Appendix F Literature, legal texts and standards**

Bick, C.; Kauertz, B.; Barthel, F. (2024) Umlaufzahlen von Mehrwegverpackungen sachgerecht ermitteln am Beispiel von Mehrwegbehältern im Außerhausverzehr. Müll und Abfall 9/2024. S. 514-519 (Properly determining circulation numbers for reusable packaging using the example of reusable containers for takeaway food and beverages. Specialist magazine "Müll und Abfall 9/2024". p. 514-519).

Directorate for the Quality of Medicines & HealthCare of the Council of Europe (EDQM) (2024): Metals and alloys used in food contact materials and articles, 2nd Edition, <https://www.edqm.eu/en/metals-and-alloys-used-in-food-contact-materials-and-articles>

Henneberg et al. (2019) Implementierung von Nachhaltigkeitskriterien für die stoffliche Nutzung von Biomasse im Rahmen des Blauen Engel, Teil 1: Machbarkeitsstudie zu übergreifenden Aspekten – Stoffliche Nutzung von Biomasse; Abschlussbericht (Implementation of sustainability criteria for the material use of biomass in the context of the Blue Angel, Part 1: Feasibility study on overarching aspects – material use of biomass; Final report). Available online at <https://www.umweltbundesamt.de/publikationen/implementierung-von-nachhaltigkeitskriterien-fuer> (last accessed: 12/09/2024)

Reference Document on Best Available Techniques in the Ceramic Manufacturing Industry, August 2007, [https://eippcb.jrc.ec.europa.eu/sites/default/files/2019-11/cer\\_bref\\_0807.pdf](https://eippcb.jrc.ec.europa.eu/sites/default/files/2019-11/cer_bref_0807.pdf)

Verburgt, T. (2021). Life Cycle Assessment of reusable and single-use meal container systems: An evaluation of the resulting environmental impacts from food delivery and take-away systems with different configurations in Belgium and the Netherlands (Master's thesis, Utrecht University).

Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food.

Commission Regulation (EC) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food.

WWF & GVM (2023) Mehrweg in der Deutschen Gastronomie (Reusable packaging in the German catering trade). Available online at <https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/Plastik/WWF-Erhebung-Mehrweg-in-der-deutschen-Gastronomie.pdf> last accessed on: 26/08/2024)

WWF (2023) Unsere große Mehrweg-Umfrage: Hat sich etwas geändert? (Our big reusable packaging survey. Has anything changed?). Available online at <https://www.wwf.de/themen-projekte/plastik/mehrweg/ergebnisse-mehrwegumfrage> (last accessed 26 August 2024)



WWF & GVM (2024) Mehrweg in der Deutschen Gastronomie. Ein Realitätscheck ein Jahr nach Einführung der Mehrwegangebotspflicht (Reusable packaging in the German catering trade. A reality check one year after the introduction of the obligation to offer reusable packaging for takeaway food and drinks). Available online at <https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/Plastik/Mehrweg-in-der-deutschen-Gastronomie-1-Jahr-Mehrwegangebotspflicht.pdf> (last accessed on: 26/08/2024)