

# **BLUE ANGEL**

## **The German Ecolabel**



## **Reusable cup systems**

### **DE-UZ 210**

#### **Basic Award Criteria**

#### **Edition January 2019**

#### **Version 1**

## The Ecolabel is supported by the following four institutions:



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



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



The Ecolabel 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 Ecolabel. It organises the process for developing the relevant award criteria in independent expert hearings – which involve all relevant interest groups.

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**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 and Nuclear Safety, 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

The growing market for cold and hot beverages for take-away consumption results in an increase in the consumption of disposable cups. Throughout Germany, 70 percent of consumers now use coffee-to-go cups particularly frequently or occasionally<sup>1</sup>. Recent surveys by the Institut für Energie- und Umweltforschung gGmbH (ifeu) as part of a current research project estimate a total quantity of 2.8 billion disposable cups per year in take-away sales<sup>2</sup> - of which approx. 1.2 billion are to-go cups. If disposable cups for cold beverages are added, this figure is much higher.

The figures show the relevance of disposable cups, which especially in the hot beverage sector are mostly made of paper fibres and coated on the inside with a thin plastic layer of polyethylene. The paper fibres are predominantly made of virgin fibres, as recycled fibres are usually problematic for use in the food sector. Added to this are the plastic lids, which are usually made of polystyrene. Disposable cups for cold beverages are primarily made of plastic from fossil raw materials. Typical plastics are polypropylene, polystyrene and polyethylene terephthalate.

In addition to the resource consumption and the associated environmental impacts, the high volume of waste also creates additional burdens for municipal waste management companies. Furthermore, an additional problem is created by pollution caused by the careless disposal of disposable crockery and other waste in roads, parks or the countryside (littering).

Reusable cups can be used to reduce the environmental impact and waste generated by disposable cups. Both the use of an individual cup and the use of a deposit cup are beneficial here. However, in the case of an individual cup - in contrast to a deposit cup - there is no certainty that it will be used sufficiently frequently to justify its higher manufacturing cost.

Life cycle assessment calculations have shown that the circulation figure of a cup, i.e. the frequency of its reuse, is an important criterion for environmental relief. The greater a reusable

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<sup>1</sup> Aral (2014): Aral study, Trends beim Kaffeegenuss 2014

<sup>2</sup> UBA Project: Untersuchung der ökologischen Bedeutung von Einweggetränkebechern im Außer-Haus-Verzehr und mögliche Maßnahmen zur Verringerung des Verbrauchs. [Study of the ecological significance of disposable beverage cups for take-away consumption and possible measures to reduce consumption.] FKZ 3717 34 339 0. Publication of results planned for January 2019.

cup's circulation figure, the lower the impact of its higher manufacturing costs - which means that the reusable systems can perform significantly better than the disposable systems.

### 1.3 Aims of the ecolabel

The aim of the ecolabel for reusable cup systems is to reduce the number of disposable cups and to strengthen environmentally friendly reusable cup systems. This includes requirements for the cups themselves, the determination of their circulation figures and the incentive to use reusable cups instead of disposable cups.

The ecolabel for reusable cup systems can be used to label reusable cup systems that distinguish themselves due to the following environmental and material properties:

- Avoidance of materials that are harmful to the environment and health,
- Avoidance of waste,
- Long service life of the reusable cups,
- Widespread introduction of reusable lids.

The following environmental and health benefits are therefore mentioned in the explanatory field:



### 1.4 Definitions

- **Reusable cup:** A reusable cup is characterised by the fact that - in contrast to a disposable cup - it is intended for reuse. It may be an individual cup or a deposit cup.
- **Individual cup:** An individual cup is purchased by the customer. When dispensing the beverage, this cup can be filled under consideration of certain hygiene measures. The cup remains in the possession of the customer and must be cleaned at home.
- **Deposit cup:** In contrast to the individual cup, this is borrowed by the customer by way of providing a deposit. This cup is filled with the beverage; once it has been emptied, customers can return the uncleaned cup and receive the deposit back. The deposit cup remains the property of the reusable cup system provider.
- **Reusable lid:** Analogous to the reusable cups there are also reusable lids, which are characterised by the fact that, in contrast to the disposable lids, they are reusable. These are also available both as **individual lids** (which are purchased by the customer) and as **deposit lids** (which can be borrowed against a deposit from the beverage vendor).
- **Beverage vendor:** This term covers all establishments whose range of products includes beverages, such as catering establishments, system restaurants, canteens and the retail trade.
- **Reusable cup system:** A reusable cup system is a service which provides deposit cups from a pool of cups on loan to beverage vendors, offers reusable lids and organises the delivery and return of used or defective cups.

- **Reusable cup system provider:** A provider of reusable cup systems. This can be a pure service enterprise, as well as an establishment of the catering trade / system catering, community catering or the retail trade, which also offers its own reusable cup system as a beverage vendor.
- **Circulation figure:** The circulation figure of a deposit cup (analogous also that of a deposit lid) is the number of fillings of a deposit cup during its useful life. The statistically determined circulation figure within a reusable cup system is calculated as the ratio of the beverages dispensed in the deposit cup of a reusable cup system provider to the average number of deposit cups of this supplier in circulation during the same period.
- **Event:** An occasion, planned and limited both in time and place, in which a group of people participates. Examples of an event include music festivals, street festivals, Christmas markets and sporting events.
- **Event-specific printed deposit cups:** For use at events, deposit cups are often printed individually and event-specifically. This means that the cups can be clearly assigned to the event, for example, by printing the logo and the dates of the event.

## 2 Scope

The ecolabel applies to reusable cups and to individual cups offered within a reusable cup system.

The cups included in the scope can be filled with hot or cold beverages as well as with other foodstuffs.

Ecolabel holders can be providers of reusable cup systems (*reusable cup system provider*), as well as establishments in the catering and system gastronomy, mass catering and retail sectors (*beverage vendors*).

Beverage vendors have the option of applying to use the ecolabel either as a supplier of reusable cups or as a supplier of individual cups. For suppliers of individual cups, the individual cups must be offered in addition to deposit cups within an ecolabel-certified reusable cup system.

## 3 Requirements

The requirements are divided into three areas:

- 3.1 Technical requirements for cups and lids,
- 3.2 Requirements for the reusable cup system provider,
- 3.3 Requirements for the beverage vendor.

The award criteria apply to the cups used (section 3.1), the organisation of the reusable cup system (section 3.2) and the beverage vendor's dispensing practice (section 3.3). Depending on the applicant's sphere of influence, different verifications must be provided as to how the award criteria are met.

Depending on the applicant, verification of the requirements must either be provided by the applicant ('x') or by way of the following verifications:

<b>Applicant</b>	3.1 Technical requirements for cups and lids	3.2 Requirements for the reusable cup system provider	3.3 Requirements for the beverage vendor
Reusable cup system provider	x	x	<i>Verification by model contract</i>
Beverage vendor, who at the same time is a reusable cup system provider	x	x	x
Beverage vendor with individual cup cooperating with an external reusable cup system provider	x <i>only for individual cups</i>	<i>Proof by Blue Angel label use contract</i>	x

If an individual cup is offered (only possible parallel to a reusable cup system), the applicant must demonstrate compliance with requirements 3.1 with regard to the individual cup.

### **3.1 Technical requirements for cups and lids**

Unless otherwise stated, the following requirements apply to the deposit cup, the individual cup and its lid.

#### **3.1.1 Material requirements**

- Cups and lids must not be made of plastics containing polycarbonate or melamine.

#### **Verification**

*The applicant declares compliance with the above requirements in Annex 1 and submits as Annex 2 a confirmation from the cup manufacturer. The applicant also specifies the material of the cup.*

#### **3.1.2 Fitness for use**

- Cups and lids must be food-safe and tasteless pursuant to the applicable legal framework regulations in accordance with Regulation (EC) No. 1935/2004<sup>3</sup> and Regulation (EU) No. 10/2011<sup>4</sup>.
- Cups and lids must be heat resistant and retain their shape even at extreme temperatures of 0 and 85°C.

#### **Verification**

*The applicant declares compliance with the above requirements in Annex 1 and submits as Annex 3 the confirmation by a corresponding test laboratory accredited according to DIN EN ISO/IEC 17025 or an authorised conformity assessment body certifying that the cup and lid meet the above requirements.*

<sup>3</sup> 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.

<sup>4</sup> COMMISSION Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food.



### **3.1.3 Plastics requirements**

If the cup is made of plastic, it must be made of unmixed plastic and not be coated with other materials in order to allow material recycling. Lids made of plastic must not be equipped or combined with materials that prevent material recycling, e.g. silicone.

#### **Verification**

*The applicant declares compliance with the requirement set out in Annex 1 and provides the manufacturer's declarations on the plastic used in the cup and lid and its grade purity (Annex 4).*

### **3.1.4 Renewable raw materials**

Any renewable raw materials used for the production of the cup and/or lid must come from sustainable agriculture/forestry.

#### **Verification**

*The applicant declares compliance with the requirement in Annex 1 and provides a certificate confirming the sustainable origin of the raw materials for the cup and lid (e.g. FSC, PEFC, International Sustainability and Carbon Certification (ISCC+), Roundtable on Sustainable Biomaterials (RSB), Rainforest Alliance (SAN), Roundtable Responsible Soy (RTRS), Roundtable on Sustainable Palm Oil (RSPO) or equivalent (Annex 5).*

### **3.1.5 Ceramic requirements**

If the cup is made of ceramic (e.g. porcelain), it must be demonstrated that it was manufactured using the best available techniques, as defined in the BAT reference document for the ceramic industry<sup>5</sup>.

#### **Verification**

*The applicant declares compliance with the requirement in Annex 1 that production shall be carried out in accordance with the best available technology as set out in the BAT reference document for the ceramic industry. Upon request by RAL gGmbH, the applicant agrees to supply suitable test reports when submitting the application, or whilst using the label, that confirm compliance with the limit values for dust emissions, waste water, energy requirements and chemical use specified in the BAT reference document as well as for process management. RAL gGmbH will only request this if there are justified doubts regarding the compliance with this requirement. Test reports must be submitted no later than three months after the request.*

### **3.1.6 Service life**

The cup must have a service life of at least 500 wash cycles. In the case of an individual cup, this also applies to its lid.

Reusable lids must have a service life of at least 100 wash cycles.

If cups or lids are printed, their imprint must also have the service life of the wash cycles stated above.

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<sup>5</sup> Reference Document on Best Available Techniques in the Ceramic Manufacturing Industry, August 2007, [http://eippcb.jrc.ec.europa.eu/reference/BREF/cer\\_bref\\_0807.pdf](http://eippcb.jrc.ec.europa.eu/reference/BREF/cer_bref_0807.pdf)

### **Verification**

*The applicant declares compliance with the requirement in Annex 1 and submits a technical data sheet or test report confirming compliance with the requirement (Annex 6).*

#### **3.1.7 System identification**

The deposit cups and deposit lids must be marked in such a way that they can be uniquely assigned and returned to their system provider.

### **Verification**

*The applicant declares compliance with the requirement in Annex 1 and submits a test sample of the cup and, if applicable, lid confirming compliance with the requirement.*

## **3.2 Requirements for the reusable cup system provider**

### **3.2.1 Deposit cup and corresponding lid**

The reusable cup system provider only uses cups and lids that meet the requirements stated under 3.1. It commits the beverage vendor to issue deposit cups to customers only for a deposit. This must be at least 50 cents.

If a lid for the deposit cup is offered by the beverage vendor, the reusable cup system provider must offer the beverage vendor a suitable reusable lid. This can either be purchased by the customer as an individual lid or can it be borrowed against a deposit as a deposit lid.

### **Verification**

*The applicant declares compliance with the requirements set out in Annex 1 and provides appropriate verification for the requirements set out in 3.1 (Appendices 2 to 6). For the proof of deposit, the applicant submits the relevant contractual passage which the applicant has concluded with the beverage vendor for the deposit fee (Annex 7).*

### **3.2.2 Deposit cups for events**

If deposit cups for events (see section 1.4 Definitions) are printed for a specific event, the reusable cup system provider must ensure that the beverage vendor does not use more than 50 percent of event-specific printed deposit cups at the event. In addition to the event-specific printed deposit cups, the reusable cup system provider must also provide the beverage vendor with at least 50 percent unprinted or otherwise printed deposit cups.

The reusable cup system provider must submit a list of events for which it supplies reusable cups. After the award of the label, the holder of the label must submit an updated list by 1 March each year at the latest which documents the events for which deposit cups were provided in the preceding calendar year.

### **Verification**

*The applicant declares compliance with the requirements set out in Annex 1 and provides a list of events which it supplied in Annex 8.*

### **3.2.3 Determination of the circulation figure**

The circulation figure must be determined annually for the calendar year by the reusable cup system provider and must be submitted annually by 1 March of the following year at the latest following the award of the label.

#### **Verification**

*The applicant records the number of beverages served at its contractually bound beverage vendors and compares this with the number of deposit cups the applicant itself has brought into circulation (= circulation figure). After the award of the label, the holder of the label must submit the circulation figure annually by 1 March of the following year at the latest. For documentation purposes, the applicant provides a brief description of the calculation of its circulation figures (Annex 9). The calculation of the circulation figure can also be carried out with the assistance of third parties (e.g. a trustee), through statistical procedures or through extrapolation from a limited number of data records.*

### **3.2.4 Recycling**

If the deposit cups and lids brought into circulation are made of plastic, they must be taken back by the provider of the reusable cup system at the end of their service life and recycled.

#### **Verification**

*The applicant declares compliance with the requirements set out in Annex 1 and specifies the plastics recycling system used to recycle the material.*

### **3.2.5 Logistics**

The reusable cup system provider has a logistics concept that demonstrably contributes to the ecological optimisation of transport routes and vehicles.

#### **Verification**

*The applicant declares compliance with the requirements set out in Annex 1 and submits a logistics plan describing the ecological optimisation of transport routes and vehicles (Annex 10).*

### **3.2.6 Information for beverage vendors dispensing hot beverages**

The reusable cup system provider undertakes to provide the following information to the beverage vendors it supplies with reusable cups that also serve hot beverages in the reusable cups:

- Guide "Good Rules for Dispensing Hot Beverages" (Appendix A)
- For the hygienically correct handling of individual cups, please refer to the information sheet: Hygiene when handling customer's own cups for dispensing hot beverages in full-service or self-service (0)
- Hygiene guideline for deposit cups in pool systems by the Bund für Lebensmittelrecht und Lebensmittelkunde e. V. - as soon as this is published in 2019 (0)

The reusable cup system provider must submit a list of vendors dispensing hot beverages which it supplies with reusable cups. It must confirm that it will make the above information available to the companies at the latest after the award of the ecolabel.

After the award of the label, the holder of the label must submit an updated list by 1 March each year at the latest that documents the hot beverage vendors which were supplied with deposit cups in the previous calendar year.

### **Verification**

*The applicant declares compliance with the requirements set out in Annex 1 and provides in Annex 11 a list of beverage vendors dispensing hot beverages which it supplies with reusable cups.*

## **3.3 Requirements for the beverage vendor**

### **3.3.1 Compliance with the "Good Rules" for dispensing hot beverages**

All beverage vendors that also use the deposit cup of the reusable cup system provider for hot beverages or are themselves holders of the ecolabel as a beverage vendor dispensing hot beverages must comply with the "Good Rules for Dispensing Hot Beverages" (0).

### **Verification**

*If the applicant is a reusable cup system provider who provides deposit cups to beverage vendors as a service, the applicant must submit a sample contract which it concludes with its beverage vendors dispensing hot beverages as Annex 7. It must be agreed in the contract that the beverage vendor is provided with the "Good Rules for Dispensing Hot Beverages" (0) and implements these in practice in the best possible way.*

*If the applicant is a beverage vendor which uses its own deposit cup and therefore functions both as a beverage vendor and as a reusable cup system provider, it must declare in Annex 1 that it complies with the "Good Rules for Dispensing Hot Beverages" (0) in all its points of sale dispensing hot beverages.*

*If the applicant is a beverage vendor offering an individual cup for sale in addition to a reusable cup system (either with its own deposit cups or with external ones), it must declare in Annex 1 that it complies with the "Good Rules for Dispensing Hot Beverages" (0) in all its points of sale dispensing hot beverages.*

### **3.3.2 Beverages served at events**

A beverage vendor, who is a holder of the ecolabel or is using deposit cups from a reusable cup system provider, may only use a maximum of 50 per cent of event-specific printed cups (see section 1.4 Definitions) at an event. The remaining deposit cups must either be unprinted, not printed for a specific date or printed from previous events.

In addition, the beverage vendor undertakes to clean event-specific printed deposit cups directly on site and to use the cups several times per event.

### **Verification**

*If the applicant is a reusable cup system provider who provides deposit cups to beverage vendors at events as a service, the applicant must submit a sample contract which it concludes with its beverage vendors as Annex 7. The contract must stipulate that the beverage vendor must comply with the above requirements.*

*If the applicant is a beverage vendor which uses its own deposit cup and therefore acts both as a beverage vendor and as a reusable cup system provider, it declares in Annex 1 that it complies with the above requirements at all its points of sale and at all events.*

### **3.4 Forecast**

When the award criteria are revised in future, inclusion of the following criteria should be considered:

- Requirements for the cleaning of cups by beverage vendors and by the supplier of reusable cup systems:
  - ♦ Use of energy-efficient dishwashers,
  - ♦ Use of green electricity.
- Definition of a minimum circulation figure

## **4 Label holders and participants**

Label holders are companies that offer reusable cup systems or beverage vendors pursuant to section 2.

Label holders for individual cups may be both reusable cup system providers (including beverage vendors that are also reusable cup system providers) that meet all the award criteria set out in this document, as well as beverage vendors that cooperate with an external reusable cup system provider and whose system is labelled with the ecolabel.

Participants in the award procedure:

- RAL gGmbH for the award of the Blue Angel ecolabel,
- The federal state in which the applicant's production site is located,
- The German Environment Agency, which receives all data and documents submitted for the Blue Angel application after the contract has been concluded, in order to be able to continue the further development of the award criteria.

## **5 Label use**

The use of the ecolabel by the holder of the label is based on a contract for the use of the label, which is to be concluded with RAL gGmbH.

The ecolabel can be used to label reusable and individual cups. Furthermore, a reusable cup system provider can advertise that it is the holder of the ecolabel by displaying the ecolabel (e.g. on its website) and publishing the certificate awarded by RAL gGmbH.

A beverage vendor may use the ecolabel on advertising boards (e.g. displays, price boards) or window stickers, provided that the holder of the label is clearly recognisable to third parties. The publication of the certificate awarded by RAL gGmbH is also permitted.

The holder of the label must ensure that the service is labelled, and not just the reusable cups or the company. In addition, the advertising measures must not give the impression that all products of the reusable cup system provider or the beverage vendor that are for sale have been awarded the ecolabel. The requirements of the Blue Angel Logo Guide must be observed.

Under this contract, the holder undertakes to comply with the requirements of section 3 for the duration of the use of the ecolabel.

Trademark use agreements must be concluded for the labelling of products and services in accordance with section 2. These contracts are valid until 31/12/2021.

The term shall be extended by a further year if the contract is not terminated in writing by 31/03/2021 or 31 March of the respective extension year.

The ecolabel may not be re-used for labelling or advertising purposes after the end of the contract. Products still on the market remain unaffected by this regulation.

The holder may apply to RAL gGmbH for the extension of the right of use for the product entitled to be labelled if it is to be marketed under a different brand name and/or trade name and/or under a different sales organisation.

The contract for the use of the label must specify:

- Label holder (distributor)
- Brand/trade name, product name
- Distributor (user of the label), i.e. the distribution organisation.

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## **Appendix A Guide "Good Rules for Dispensing Hot Beverages"**

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

Disposable cups produce a lot of waste and have a high environmental impact due to their high volume. You should therefore always offer your customers their beverage in a deposit cup if they wish to take it away. Politely inform your customers about your reusable cup system. And only provide a disposable cup if this is expressly requested. Because every disposable cup saved benefits the environment.

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

Not only the disposable cups produce a lot of waste - the disposable lids do, too. Therefore, you must also offer your customers reusable lids in addition to the reusable cups. Like the deposit cups, the lids must be made of environmentally friendly materials. You can either offer the lids for a deposit or sell them to your customers as individual lids.

### **c) Also a good thing: Filling customers' own cups**

Some customers are already using their own individual cups for their "coffee-to-go". It's great for the environment! Therefore, if the customer's own cups are hygienically in order, they must be filled by you. Please refer to the hygiene leaflet of the Bund für Lebensmittelrecht und Lebensmittelkunde e. V.<sup>6</sup>

### **d) Everything has its price - even disposable cups**

Unnecessary disposable plastic bags have almost become a phase-out model - thanks to a voluntary commitment of the retail trade: The number of bags handed out dropped by a third in 2017. And why is that? Because customers have to pay for the bags. Disposable cups should also have such a "surcharge". It is therefore important to create incentives for beverages served in a deposit cup or in the customer's own cup. This can be done for instance using a discount system, or by levying an actual surcharge for a beverage in a disposable cup. For this we recommend that you convey to your customers that this surcharge is a kind of "environmental charge" for the high environmental impact of the disposable cup, similar to the charge for disposable plastic bags.

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

The more often a cup is used, the better for the environment! Because every reused cup saves one disposable cup. And in order to know how often a deposit cup is used, it is important to determine its circulation figure. For this purpose, you or your reusable cup provider require information about the number of beverages served in the deposit cup. We recommend that you assign your own registration number to beverages served in the deposit cup in your cash register system. This way you can inform the reusable cup system provider of the number of deposit cup beverages served and support the provider in preparing its statistics on circulation figures.

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

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<sup>6</sup> Download at <https://www.bll.de/download/merkblatt-coffee-to-go.pdf>

**f) Less is more**

The less waste the better: The deposit cups must therefore not be provided with additional sleeves (e.g. as heat protection or advertising media).

**g) Recycling at the end**

In order to act sustainably until the very end, you commit to take back all deposit cups and, if necessary, also deposit lids, including damaged ones. You then either return them to your reusable cup system provider or you recycle them yourself (as a supplier of your own reusable cup system).

**h) Last but not least: Show that the environment is important to you**

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



## **Appendix B Information sheet "Coffee-to-go"-cups Hygiene when handling customer's own cups for dispensing hot beverages in full-service or self-service (in German)**

Download the leaflet published by the Bund für Lebensmittelrecht und Lebensmittelkunde e.V. at <https://www.bll.de/download/merkblatt-coffee-to-go.pdf>

## **Appendix C Hygiene guideline for deposit cups in pool systems of the Bund für Lebensmittelrecht und Lebensmittelkunde e. V.**

The hygiene guideline for deposit cups was still being drawn up at the time these award criteria came into force. Publication is planned for the end of 2019. The guideline only needs to be handed over to the beverage vendors pursuant to section 3.2.6 after its publication and inclusion in these award criteria.