

**SDR
PORTUGAL**



COLLECTION POINT MANUAL

RULES AND GUIDELINES FOR THE COLLECTION OF PACKAGING

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DRS Glossary

Frequently asked questions

Guide to the DRS Transition Period

DRS Technical Specifications - RVM

Guide for Registration on the SDR Portugal Portal (to be completed with registration of collection points)

Data Dictionary for Registration of Collection Points – include User Registration Guide

Draft DRS Accession Agreement – Collection Points

Communication Guide for Collection Points

Checklist for Automatic Collection Points

Support Brochure for Manual Collection Points

Support brochure for establishments in the HORECA sector

Handling Fee

(Items in blue do not yet exist. Items in yellow exist but are not finalised, complete or approved)

1. Introduction

The Collection Point Manual is a technical document associated with contracts with Authorised Collection Points, which aims to provide practical guidelines for the establishment and operation of Collection Points for the Deposit and Refund System (DRS) and for interaction with SDR Portugal.

The infrastructure and equipment of Collection Points must comply with applicable national and European regulations, including accessibility requirements, and be operated accordingly.

This manual is regularly reviewed and updated, and we recommend checking SDRPortugal.pt to ensure you have the latest version.

For a better understanding of this document, we recommend consulting the "[DRS Glossary](#)", available at SDRPortugal.pt, which contains definitions of technical terms, as well as abbreviations and acronyms used throughout the text.

SDR Portugal also provides answers to "[Frequently Asked Questions](#)" at SDRPortugal.pt, with a view to assisting with the functioning of the DRS and its processes, ensuring that it is updated regularly.

1.1. DRS Collection Points

The DRS has an organised collection network to ensure the return and effective treatment of the packaging covered, tailored to the needs of consumers and the various entities involved in the system¹:

- a) Retail outlets;
- b) Collection points established as a result of agreements concluded, in particular with establishments in the HORECA sector, with municipalities or with municipal and multi-municipal urban waste management systems;
- c) Other collection points set up in public spaces and municipal areas, on the initiative and under the responsibility of SDR Portugal.

In retail establishments, collection points must be installed according to the display and sales area under the following conditions²:

¹ Article 30-G of Decree-Law No. 152-D/2017, of 11 December, as currently worded (No. 1)

² Article 30-H of Decree-Law No. 152-D/2017, of 11 December, as currently worded (No. 1)

- a) Establishments with a continuous area of 400 m^2 or more, with the obligation to receive all packaging included in the DRS;
- b) Establishments with a continuous area greater than 50 m^2 and less than 400 m^2 , with the obligation to receive only the beverage packaging they sell. However, if they opt for automatic collection, they are obliged to accept all beverage packaging included in the DRS.

The DRS includes different types of DRS Collection Points ("Volta Collection Points"):

- Automatic Collection Points "Volta Machines"

Network of automatic machines for returning packaging, consisting of *reverse vending machines* (RVM), also known as "Volta Machines", installed under authorisation from SDR Portugal in retail establishments or other spaces. They are obliged to accept all packaging included in the DRS.

The "Volta" machines must comply with the requirements defined by SDR Portugal in the document *DRS Technical Specifications – RVM* and obtain the respective certification.

The "Volta" Automatic Collection Points are operated by Retailers or Other Entities that have an agreement with SDR Portugal and are required to obtain the respective certification.

- Manual Collection Points "Volta"

Manual collection allows smaller food retailers to accept packaging covered by the DRS at the counter, without the use of reverse vending machines. They are only required to accept beverage packaging that they sell in their own establishment.

The Manual Collection Points "Volta" are operated by retailers who have entered into an agreement with SDR Portugal and are required to obtain the relevant certification.

- Centres "Volta"

These are large-capacity facilities located in public spaces, designed for the rapid collection and return of large quantities of packaging. Located at strategic points, they provide an efficient solution for the collection of packaging from HORECA establishments or traditional shops and other entities with a high flow of packaging. These centres are also available to consumers. They are obliged to accept all packaging included in the DRS.

The "Volta" centres are operated directly by SDR Portugal or by third parties contracted for this purpose and under the responsibility of SDR Portugal.

- "Volta" kiosks

These are compact, automated facilities with medium capacity, located in public spaces, designed for the automatic collection of packaging. They complement the DRS collection network, providing an additional drop-off point in busy areas or areas with a high density of HORECA establishments. They are required to accept all packaging included in the DRS.

The "Volta" kiosks are operated by SDR Portugal or by third parties contracted for this purpose and under the responsibility of SDR Portugal.

1.2. Packaging accepted at the DRS ("Volta packaging")

The "Volta Collection Points" can only accept packaging covered by the DRS. In other words, packaging from products previously registered with the DRS.

These packages are identified using the database provided by SDR Portugal, which contains information on each product: GTIN/EAN code (represented by the barcode), product category, brand, responsible packager, format, material and capacity of each type of package.

The packaging covered is also required to display the Volta symbol, for simple and immediate identification of packaging registered with the DRS. The Volta symbol, a registered trademark of SDR Portugal, is strictly authorised for use by packagers participating in the SDR, under the terms of the contract, and is intended to confirm that they are responsible for collecting the deposit when they place the packaging on the market. The deposit amount is transmitted in each transaction throughout the distribution chain, from placing on the market to the final consumer.

At Automatic Collection Points, packaging is recognised by RVM identification systems, which are continuously updated with the latest information from the database managed by SDR Portugal. The packaging to be returned must be in its original form, with the lid (where applicable), the label intact with the barcode and the Volta symbol legible, as set out in the document "[DRS Technical Specifications - Marking](#)", available at [SDRPortugal.pt](#).

At Manual Collection Points, recognition is made by observing the packaging to be returned, which must also be in its original form, with the lid (where applicable), the label intact with the barcode and the Volta symbol legible. In addition, the database available at [SDRPortugal.pt](#) (via the DRS app or electronic interface) can be consulted.

Packaging rejected or not recognised by the RVM, as well as packaging that is not in a condition to be accepted at manual collection points, must be sent for recycling via the yellow recycling bins, and the deposit will be considered lost. Collection is guaranteed by the Integrated Packaging Waste Management System (SIGRE).

1.3. Transition Period

The Transition Period is the period after the DRS becomes operational ("DRS Go Live") during which beverages with Volta and "pre-DRS" packaging may coexist on the market.

The coordination of deadlines for placing products on the market by the respective packers and their availability by distributors, wholesalers, retailers and HORECA establishments during this transition period is extremely important in order to:

- ensure consumer confidence,
- meet collection targets,
- prevent product supply disruptions in the market,
- avoid losses of packaging materials and/or already packaged products,
- prevent fraud that could financially compromise the DRS.

The guidelines for the transition period and the transition schedule are set out in the "[*Guide for the DRS Transition Period*](#)" document, available at [*SDRPortugal.pt*](http://SDRPortugal.pt).

2. Registration and Membership Agreement

Volta Collection Point Operators enter into a contract with SDR Portugal for the purpose of authorisation to collect Volta packaging.

To this end, each Collection Point must be registered in advance at SDR Portugal Portal , accessible through the area dedicated to [Collection Points](#) at [SDRPortugal.pt](#).

The registration process for Collection Points is carried out in several stages:

- 1 Registration of User Key (or Administrator);
- 2 Company Registration;
- 3 Collection Point Operator Registration;
- 4 Collection Point Registration;
- 5 Digital signature of the contract with SDR Portugal;
- 6 Approval of Collection Points.

A detailed description of each registration stage is provided in [the "Guide to Registering on the SDR Portugal Portal"](#).

The [Draft DRS Adhesion Agreement – Collection Points](#) to be established between each Collection Point Operator and SDR Portugal is available in the annex.

Under the terms of the agreement, SDR Portugal grants participating Collection Point Operators authorisation to install the necessary conditions for their operation, with a view to collecting Volta packaging. Volta Point operators shall ensure that their installation and operation comply with the requirements. All Volta Points are required to obtain certification from SDR Portugal.

The image and publicity associated with the collection points shall follow the harmonised communication guidelines defined by SDR Portugal in the [Communication Guide for Collection Points](#), which provides proposals for communication materials, the respective technical support and the rules for their use.

In turn, SDR Portugal is obliged to pay the costs associated with the installation and operation of the collection points, through the handling fee established at³ , and to reimburse the deposit amounts paid to consumers at⁴ within a period not exceeding 30 days.

³ Article 30-P of Decree-Law No. 152-D/2017, of 11 December, as currently worded

⁴ Article 30-S of Decree-Law No. 152-D/2017, of 11 December, as currently worded (No. 2)

2.1. Registration of Collection Points

All retail establishments covered by the legal obligation to install collection points are required to register on the SDR Portugal Portal, regardless of the type of collection to be adopted or whether they are covered by the exemption scheme.

Collection points must be registered at least 30 days before they start operating.

2.2. Exemption from the requirement to set up a collection point

Establishments with a continuous display and sales area of more than 50 m² and less than 400 m² may request exemption from the obligation to receive DRS packaging when the following requirements are met⁵:

- they demonstrate a proven inability to receive packaging, assessed on the basis of the unavailability of an area for storing packaging of at least 2 m²;
- provided that there is a sufficient minimum density of collection points in the vicinity of their location, assessed as at least one active collection point within a radius of 500 m.

Once registered on the SDR Portugal Portal, the exemption request must be submitted together with supporting documents confirming and certifying that the exemption criteria have been met and allowing for assessment by SDR Portugal.

2.3. Temporary suspension of Collection Point activity

If a Collection Point is temporarily unable to operate, namely due to temporary closure or restrictions on operations that prevent compliance with the contractually agreed requirements, SDR Portugal must be notified.

This notification must be submitted 15 days in advance, except in accidental or unforeseen circumstances, which must be reported as soon as possible. The notification must be sent to recolha@sdrportugal.pt.

2.4. Cancellation of Collection Point activity

The cancellation of a Collection Point's activity must be communicated to SDR Portugal 15 days in advance, except in accidental or unforeseen circumstances, which must be communicated as soon as possible.

⁵ Article 30-H of Decree-Law No. 152-D/2017, of 11 December, as currently worded (No. 2)

3. Automatic Collection Points

RVM machines enable the recognition and automated return of packaging covered by the DRS. Once the packaging has been accepted, the machine issues a receipt corresponding to the deposit amount, which can be deducted at the point of sale. The deposit amount can also be transferred to a digital voucher on the customer's loyalty card (valid for 1 year), refunded in cash, transferred to donations or refunded via bank transfer (e.g. via MBWay). This equipment requires a 24-hour electrical and internet connection to ensure the security, integration, traceability and monitoring of the system. In the case of receipt issuance, this data must be integrated with the collection point operator's information system within a few seconds for potential "immediate" use at the point of sale.

The information to be recorded can be found in *the Data Dictionary for Collection Points*, which is attached to *the Guide for Registration on the SDR Portugal Portal*.

In addition to *the Collection Point Manual*, training sessions will be provided on the procedures to be followed by collection points and on the use of the SDR Portugal Portal.

All entities involved in this process are contractually bound to strict duties of confidentiality and protection of information and packaging samples.

3.1. RVM suppliers and certified RVM models

RVM suppliers and RVM models approved by SDR Portugal comply with the requirements set out in the *SDR Technical Specifications – RVM* document, which can be consulted at SDRPortugal.pt.

RVM suppliers approved by SDR Portugal register their certified RVM models on the SDR Portugal Portal.

Collection Point operators can choose the RVM model and supply solution they consider most suitable for their needs.

Only packaging collected through certified RVM models installed at Collection Points registered and approved by SDR Portugal will be considered for the purposes of refunding the Deposit Value and paying the Handling Value.

3.2. Minimum requirements for Automatic Collection Point

Opening hours

RVM machines must be accessible to consumers during the opening hours of establishments that have been designated as Collection Points. Measures to be taken when packaging must be returned outside the establishment's opening hours must be agreed separately with SDR Portugal.

Operating conditions

RVM machines and surrounding areas must be easily accessible to consumers and must be clean and tidy, ensuring a comfortable, convenient and efficient service. The collection point must also ensure the daily cleaning of RVM machines and their operational maintenance.

All procedures related to the logistics of returning bags must be ensured.

Communication

Packaging collection points must be clearly marked and must follow the communication guidelines set out in *the Communication Guide for Collection Points*.

3.3. Bags and seals

RVM machines may only be used with bags and seals supplied by SDR Portugal. Collection Point Operators with RVM machines are responsible for ordering bags and seals through the SDR Portal. Consumables can be managed individually by each Collection Point or grouped for several Collection Points under the responsibility of the respective Collection Point Operator.

3.4. Return logistics

Full bags must be sealed with the security seal. The collection point must store the bags until collection and load them for collection.

The full, sealed bags are taken to counting and sorting centres, where the materials received are recorded. The returned packaging is counted in the RVM machine, and the deposit value is refunded and the handling fee paid to the collection point operator by SDR Portugal. The procedures can be found in the Collection Point contract.

3.5. Cleaning of machines

Regular cleaning of RVM machines during operation is essential to ensure regular use of the machines. The Collection Point Operator is therefore required to comply with the minimum cleaning frequency specified by each manufacturer. In the event of dirt, for example due to packaging that has not been completely emptied, additional cleaning must be carried out. Since the cleaning effort is included in the calculation of the handling fee, SDR Portugal reserves the right to carry out analyses of the cleanliness of the RVM machines in the event of reported incidents, particularly in the event of consumer complaints.

3.6. Minimum maintenance and technical assistance requirements

Accredited RVM machines that have been put into operation must be serviced and maintained periodically by the respective manufacturer or by third parties authorised for this purpose, in order to ensure the uninterrupted and regular operation of the RVM machine.

It is recommended that maintenance be preventive and carried out by the collection point operator no later than 3 years after the machine is first put into service. From the 4th year onwards, preventive maintenance is recommended at least once every 12 months.

Changes to RVM machines during maintenance, technical assistance or repair work are only permitted if the individual hardware and software components continue to meet the updated requirements of SDR Portugal and are therefore certified or approved for DRS. The following changes must be specified on the SDR portal:

- a. Change of VMS serial numbers
- b. Changes to components, such as a new type of compactor
- c. Expansion of the take-back unit, e.g. with an additional compactor
- d. Conversion of mixed collection to individual collection by material
- e. Conversion of individual collection by material to mixed collection
- f. Change of collection containers, e.g. size or conversion to Rollpac
- g. New software version

It must be ensured that existing data is never lost due to failures or changes in data storage or storage capacities.

If, for any reason, the aforementioned assistance and maintenance are not carried out or are no longer possible for the accredited RVM machine, or if a software update required for the RVM machine is no longer available, the RVM machine will be considered certified and accredited for a further 12 months from the last successful assistance, maintenance or software update, provided that the RVM machine remains secure (in terms of data exchange and fraud), problem-free (in terms of hardware) and compatible (in terms of software) with SDR Portugal's systems. Any other operation of the RVM machine may be agreed with SDR Portugal.

3.7. Breakdown or deactivation of automatic waste collection machines

If the necessary data exchange is interrupted or if the RVM machine cannot be used by the end consumer for any other reason, the RVM machine must be taken out of service. If this downtime lasts for more than 72 hours, the packaging can be collected manually. The corresponding provisions for manual collection apply until the RVM machine is fully operational again. In this case, automatic collection bags may be used for manual collection. However, separate collection of compacted and non-compacted packaging at the respective collection point must be ensured. There must be no mixing of packaging in the bag, as manually returned packaging must be taken to counting points for manually collected packaging.

3.8. Notifications via the SDR portal

- Unplanned interruptions do not have to be reported on the SDR portal.
- The date of planned dismantling must be reported on the SDR portal.
- If an unplanned interruption becomes a planned interruption (e.g. due to the inability to supply spare parts or similar), this interruption time must be reported on the SDR portal.

3.9. Permanent closure of a collection point

In the event of the permanent closure of a collection point or permanent switch to manual collection, the collection point operator must report this on the SDR Portugal portal. The RVM machine must be removed from the DRS system by SDR Portugal. The change of location of an accredited machine to another collection point must also be reported on the SDR portal and requires re-accreditation by the collection point operator of the new collection point.

3.10. Storage, sealing and collection of bags

Volta packaging returned by consumers is the property of SDR Portugal from the moment it is accepted by the RVM machine.

As soon as each bag is completely filled with returned Volta packaging, it must be properly sealed with a security seal provided for this purpose. Each seal contains a unique identification number. Security seals for sealing the bags are supplied by SDR Portugal together with the bags. These seals may not be used for any other purpose.

The bags containing the returned packaging must be temporarily stored and kept until they are collected. During this period, the Collection Point must ensure that temporary storage is carried out in such a way as to prevent the bags from tearing or their contents from being tampered with.

As soon as the requirements defined by SDR Portugal are met, the Collection Point Operator must register the stored full bags via the SDR Portugal Portal, using the numbering provided by SDR Portugal, so that they can be collected. A minimum quantity for collection requests by SDR Portugal will also be defined for each collection point, depending on its storage capacity.

For the collection of bags, it is necessary to ensure that the identification number of each seal is associated with the Manual Collection Point. To this end, it is possible to scan the barcode on the seals using a terminal device or smartphone or manually enter the unique identification number in the area provided for this purpose on the SDR Portugal Portal.

Bags with Volta® packaging are collected at the Collection Point by a logistics operator contracted by SDR Portugal. The bags are transported to the nearest counting centre. The barcode with the unique identification number of the seals is scanned to ensure the traceability of each bag with packaging and, consequently, its contents.

3.11. Minimum requirements regarding information for end consumers

3.11.1. Deposit payment

The deposit amount for packaging subject to a deposit must be returned to each end consumer when they return the packaging. The return can be made in the following ways:

- a. Deposit voucher
- b. Dematerialised deposit voucher (e.g. on a customer loyalty card)
- c. Cash payment
- d. Cashless payment (e.g. direct bank transfer)
- e. Donation

If the take-back process is cancelled (e.g. due to a blockage, technical fault, etc.), the RVM must issue a deposit voucher or other suitable credit note for the Volta packaging that has been checked and accepted up to that point, so that the deposit can be returned to the end consumer.

3.11.2. Deposit voucher

After successful inspection and acceptance of the Volta packaging, the RVM machine must generate a deposit voucher with at least the corresponding value and number of packaging items, a unique barcode, the date of issue and expiry date.

Minimum requirements to be included on a printed deposit voucher:

- a. Deposit value
- b. Number of returned packaging items
- c. Total value of the returned packaging
- d. Date of issue
- e. Expiry date

3.11.3. information

The RVM must have a clearly visible display that supports and guides the user in using the RVM. Depending on the situation, the display must contain, among other things, the following information:

- The packaging has been recognised and accepted as Volta® packaging and a deposit value to be refunded has been recognised;
- The Volta® packaging was not recognised and was rejected, with the reason for rejection indicated. In this case, no deposit can be recognised for this packaging.

3.11.4. Option to make a donation

The recipient can choose, via the RVM machine, to donate the deposit amount to a social or charitable cause. The end consumer can donate the deposit amount for correctly returned Volta® packaging.

3.12. Inspection and review

SDR Portugal, either directly or through an independent entity, carries out audits, inspections and tests at collection points, through an annual plan of scheduled audits or, when justified, on an exceptional basis at any time and without prior notice, in order to verify that RVM machines certified by the manufacturers and put into operation by the collection point operator are in operation at the registered collection points, that any necessary adaptations have been made and that the RVM machines comply with the accreditation and certification requirements and regulations specified by SDR Portugal. These inspections and verifications may cover specific requirements or all requirements necessary for the DRS

system. They shall be carried out during normal operating hours and in such a way as to cause as little disruption as possible to the activities of the Collection Point (e.g. avoiding peak hours or shopping days before long weekends or public holidays).

If the inspection or test reveals that the relevant requirements are not met, the corresponding corrections, including proof of their implementation, must be made within a reasonable period of time, to be assessed by SDR Portugal on a case-by-case basis. SDR Portugal reserves the right, depending on the duration or nature and importance of the non-compliance for DRS, to suspend the accreditation of the affected RVM or collection point, or to cancel the accreditation of the RVM in its entirety until full compliance with the requirements is achieved. This right may only be exercised after repeated and recurring non-compliance, and a minimum of 3 warnings.

SDR Portugal shall provide the operator of the automatic collection point with a report on the inspection or test.

3.13. Use of data, right of use and disclosure

For the return of Volta packaging, data exchange is required between SDR Portugal, the RVM machine manufacturer and the operator of the automatic collection point (via the RVM machines).

All data transmitted or generated in this context is subject to limited rights of use and data transmission.

The data that SDR Portugal or the RVM machine manufacturer transmits to the collection point operator, as well as the data that the recipient generates through the return via the RVM machines, are subject to the confidentiality clause agreed between SDR Portugal and the automatic collection point operator in the automatic collection point contract, and may not be transmitted to third parties beyond this clause.

3.14. Fraud risk and mitigation

Beverage container deposit and refund systems are frequently subject to various attempts at fraud, for which it is important that Collection Point Operators are vigilant in order to avoid and prevent such situations.

The most common types of fraud in the automatic collection process consist of:

- sticking a label from a container that is part of the DRS, or simply a label with its barcode, on containers that are not covered or other objects that are similar in shape and weight;
- attempting to read the same packaging repeatedly in automatic machines by attaching it with a string;

- attempting to misuse vouchers by printing fake vouchers or attempting to redeem the same voucher repeatedly.

To mitigate the first type of fraud, it is essential that the recommendations are followed so that the programming of the automatic machines allows a high level of control of the packaging to be taken back. The RVM must ensure the verification of a set of variables in order to confirm the authenticity of each package to be accepted, namely the weight, dimensions, format, barcode and material. However, the return of large quantities of packaging, and in particular when a large quantity of identical packaging is returned by the same user, should be a warning sign and the Collection Point team should seek to verify whether potential fraudulent activity may be taking place.

Repeated attempts to read the same packaging should be restricted by the RVM machine, preventing the reverse movement of a package or the placing of a hand or arm inside the reading area of the RVM machine. The collection point team should be alert to indications of RVM machine jamming or abnormal consumer behaviour when placing packaging in the RVM machines.

With regard to attempts to defraud the deposit voucher system, the collection point's computer systems must always ensure that:

- the voucher presented is genuine and eligible for redemption at the respective store;
- the voucher presented has not already been redeemed.

To mitigate the risk of something going wrong in this (digital) process, it is important that the collection point:

- physically destroy (tear up) vouchers after they have been redeemed (even if they are electronically "burned", the temptation to misuse a voucher is always a moment of operational stress);
- be alert to high-value vouchers and take extra care to verify their authenticity;
- seek to quickly resolve situations related to communication problems that cause RVM and/or POS to operate "offline", which can lead to fraud.

To minimise the risk of fraud, SDR Portugal carries out systematic data analysis, machine inspections and intensive cooperation with the competent authorities. Inspections are carried out by DRS or by independent third parties contracted by SDR Portugal. The inspector must have unlimited access to the automatic machines. In the event of suspected fraud, DRS is authorised to take measures to reduce or

eliminate the risk to DRS. In particular, the following measures may be taken, although this list is not exhaustive and the order in which they are processed may vary depending on the circumstances:

- a. consultation with the collection point operator;
- b. limiting the return of deposits to a certain amount;
- c. cancellation of ongoing transactions, including the suppression of deposit issuance;
- d. deactivation of individual GTINs;
- e. on-site inspections;
- f. (temporary) deactivation of RVM machines and conversion of the collection point to manual collection;
- g. filing criminal complaints or reporting incidents to the police or other authorities.

A responsible person must be appointed for each collection point, who will be responsible for fraud prevention in particular. These persons will liaise with SDR Portugal in cases of suspected fraud. In the case of Collection Point Operators of large retail chains, a central contact person may be appointed.

In the event of imminent danger (e.g. observation of fraud in real time, digitally or on site) and if it is not possible to contact the responsible person, SDR Portugal may take action even without prior information to the respective Collection Point Operator.

The operator of the automatic collection point must report cases of potential fraud via the email address recolha@sdrportugal.pt. Where applicable, they must also notify the competent authorities.

The RVM Supplier, the Collection Point Operator and SDR Portugal will endeavour to work in partnership to analyse and investigate all cases of fraud or attempted fraud and to take appropriate measures to combat them, supporting each other in this objective. This may include the provision of relevant data and records in accordance with applicable personal data protection regulations.

3.15. Data Management

The Collection Point Operator shall ensure that the automatic machines are permanently equipped with a secure and uninterrupted power supply and an adequate data connection that allows data to be updated and synchronised at any time. This also applies to periods outside the collection point's operating hours.

The RVM machine may use the data connection of the collection point, provided that it has the speed and bandwidth necessary to meet the technical requirements.

Data exchange is carried out bidirectionally between the RVM machine manufacturer and SDR Portugal and the collection point operator. Therefore, communication between the RVM machine and its

manufacturer (system) must be ensured. Details on data exchange between the RVM machine, the RVM machine manufacturer and SDR Portugal are regulated in a separate document.

Information protection is essential in any DRS, as confidential information circulates in the system and must be protected. Therefore, access to the information stored in the RVM machines is restricted exclusively to authorised technicians and exclusively for maintenance and support or service management purposes. The Collection Point Operator must confirm the identity of technicians who access the RVM machines and prevent access to anyone who is not duly accredited as a technician of the respective supplier.

Collection point employees have access to RVM machines only for the purposes of cleaning and maintaining the equipment, whether to change bags or replace other consumables, or to resolve problems. Access to databases and information stored on RVM machines must be restricted to users belonging to the RVM supplier, with individualised and confidential access keys, which must not be shared.

The *Checklist for Automatic Collection Points*, available in the annex, is intended as a guide for Collection Points to easily verify the requirements defined by SDR Portugal (to be developed).

4. Manual Collection Points

Manual collection allows smaller food retail outlets to accept packaging covered by the DRS at the counter without the use of automatic collection machines.

If they have a sales area of less than 400m², they are required to collect and refund the deposit only for Volta packaging sold in their establishment.

This option is a practical collection solution for smaller establishments that are unable to install reverse vending machines, ensuring that consumers continue to have access to the return and refund system.

Manual Collection Points are operated by retailers who enter into an agreement with SDR Portugal and obtain the relevant certification.

To be accepted, Volta packaging must be empty, undamaged, with the lid (if applicable), display the logo with the Volta symbol and have a barcode corresponding to an eligible GTIN/EAN code, i.e. corresponding to a product registered (and approved) in the DRS.

In addition to electronic access, SDR Portugal provides an application that allows you to check whether packaging is registered with the DRS by validating the respective GTIN/EAN code and the type of packaging.

4.1. Manual return of Volta packaging by the end consumer

Only Volta packaging bearing the Volta symbol and GTIN/EAN code registered in the application provided by SDR Portugal at SDRPortugal.pt can be returned.

If they have a sales area of less than 400m², Manual Collection Points are only required to take back Volta® packaging that they sell in their establishment and in the quantities that end consumers usually purchase at that point of sale.

4.2. Control of Volta packaging

For the return of Volta packaging, Collection Point Operators shall ensure compliance with SDR Portugal's acceptance requirements. To this end, it is necessary to check that each package:

- is completely empty;
- is intact;
- has the lid in place (where applicable);
- shows no signs of having been compacted or perforated in a reverse vending machine;
- has a fully legible barcode (or GTIN/EAN code);
- has the Volta symbol clearly legible.

In addition to visually inspecting each package, the Collection Point Operator may use electronic access or the app available on a smartphone to confirm the barcode and its correspondence to the product and type of packaging to be returned, as recorded in the SDR Portugal database.

If any of the above conditions are not met, the packaging cannot be returned under the DRS, and therefore there will be no refund of the Deposit Amount or payment of the Handling Fee.

4.3. Deposit payment

After successful inspection of each Volta packaging item taken back, the Manual Collection Point Operator must refund the consumer the total amount of the Deposit Amount established, which may be done in the following manner:

- a. Deposit voucher
- b. Dematerialised deposit voucher (e.g. on a customer loyalty card)
- c. Cash payment
- d. Cashless payment (e.g. direct bank transfer)

4.4. Prevention of fraud in Manual Collection

Collection Point Operators must be vigilant to avoid and prevent fraud.

The most common types of fraud in the manual collection process are:

- sticking a label from a package that is part of the DRS, or simply a label with its barcode, on packages that are not covered or other objects that are similar in shape and weight;
- attempting to misuse vouchers by printing fake vouchers or attempting to redeem the same voucher multiple times.

To mitigate the first type of fraud, it is essential that the recommendations for checking the packaging to be returned, as described in the previous point, are followed.

With regard to attempts at fraud involving vouchers, the IT systems at collection points must always ensure that:

- the voucher presented is genuine and eligible for redemption at the respective store;

- the voucher presented has not already been redeemed.

To mitigate the risk of something going wrong in this (digital) process, it is important that the collection point:

- physically destroy (tear up) vouchers after they have been redeemed (even if they have been electronically 'burned');
- be alert to high-value vouchers and take extra care to verify their authenticity;
- seek to quickly resolve situations related to communication problems that cause POS terminals to operate "offline", which may lead to fraud.

Any suspicion of fraud should be reported to SDR Portugal.

4.5. Collection and storage of manually collected packaging

Volta packaging returned by consumers is the property of SDR Portugal from the moment it is collected from the Collection Point by SDR Portugal or an entity contracted by SDR Portugal.

Only bags supplied by SDR Portugal should be used for packaging these items. These bags cannot be used for any other purpose.

4.6. Sealing the bags

As soon as each bag is completely filled with the returned Volta, it must be properly sealed with a security seal provided for this purpose.

Each seal contains a unique identification number.

The security seals for closing the bags are supplied by SDR Portugal, together with the bags. These seals may not be used for any other purpose.

4.7. Temporary storage of returned packaging

Bags containing returned packaging must be stored temporarily and kept until they are collected.

During this period, the Collection Point must ensure that temporary storage is carried out in such a way as to prevent the bags from tearing or being compressed, in order to guarantee the correct packaging of the collected packaging.

4.8. Organisation of the collection of sealed transport packaging

As soon as the requirements defined by SDR Portugal are met, the Collection Point Operator must register the stored full bags via the SDR Portugal Portal, using the numbering provided by SDR Portugal, so that they can be collected. A minimum quantity for collection requests by SDR Portugal will also be defined for each collection point, depending on its storage capacity.

For the collection of bags, it is necessary to ensure that the identification number of each seal is associated with the Manual Collection Point. To this end, it is possible to scan the barcode on the seals using a terminal device or smartphone, or manually enter the unique identification number in the area provided for this purpose on the SDR Portugal Portal.

4.9. Collection of bags with Volta packaging

Bags with Volta packaging are collected at the Collection Point by a logistics operator contracted by SDR Portugal .

4.10. Transport of bags with Volta packaging

The bags are transported to the nearest counting centre. The barcode with the unique identification number on the seals is scanned to ensure the traceability of each bag with packaging and, consequently, its contents.

The returned Volta packaging is counted by a counting machine, which ensures automatic recognition of the packaging and confirmation of the requirements necessary to validate the refund of the Deposit Value paid to consumers by the Collection Point and the Handling Value associated with the service provided to SDR Portugal.

Once the count is complete, the final data for each bag is transferred to the information system for subsequent invoicing. The status of the process can be checked at any time in the Collection Point Operator's account on the SDR Portugal Portal.

4.11. Civil liability

SDR Portugal assumes the risk from the moment the logistics partner receives the packaging with deposit on behalf of SDR Portugal at the collection point until its delivery to a counting centre. The traceability of the transport is ensured by reading the seal on each bag at each stage of transport.

4.12. Payments

Based on the data recorded, SDR Portugal shall make payment to the Collection Point Operator on a monthly basis, as described in chapter 7. The billing details (broken down for each Collection Point, with information on the bags collected) and the respective status of the process are stored on the SDR Portugal Portal and can be consulted at any time for control purposes.

The *Checklist for Manual Collection Points* , available in the attachment, is intended to serve as a guide for Collection Points to easily verify the requirements defined by SDR Portugal.

5. Communication Materials

SDR Portugal ensures the development and adoption of a communication strategy that guarantees a harmonised experience for consumers regardless of the region of the country where they are located or the type of Collection Point.

To this end, guidelines and communication materials are provided with the relevant technical drawings and rules for their use in *the Communication Guide for Collection Points*.

It is the responsibility of the Collection Points not only to collect the Volta packaging that will be returned by consumers, but also to provide consumers with all the help they need in this process and to clarify any questions they may have. In this regard, it is crucial not only that the teams operating each Collection Point have full knowledge of how the system works, but also that there is clear communication to help consumers answer any questions they may have, namely:

- Where to return their packaging?
- Which packaging should be returned?
- How to return the packaging?

Each Volta packaging collection point must be clearly marked with communication materials that convey the harmonised image and concept of the Volta brand. In the case of automatic collection machines, these must display the image and message defined by SDR Portugal, as they are the most visible elements in the interaction with consumers.

The Volta logo may not be used outside the conditions described in the Communication Guide. Furthermore, it is recommended that only materials proposed or approved by SDR Portugal be used.

The deposit amount must always be specified on any medium that shows the sale price of the products covered, namely receipts and invoices, as well as on all price display media, such as labels, posters, digital kiosks, websites, leaflets, billboards, etc.

Both receipts or invoices and vouchers issued by automatic collection machines must clearly indicate the deposit amount paid or redeemed, in unit and aggregate terms, in accordance with the instructions below:

Standardised communication helps the end consumer to quickly understand the changes and the DRS processes.

6. Periodic Declarations and Reports

Collection point operators will have electronic access to all information resulting from their activity and must send SDR Portugal all information necessary for the proper management of the system. All declarations and reports are submitted in electronic format via the DRS Portal.

Information that will be made available (not exhaustive):

- eligible products;
- quantities collected;
- logistics activity;
- invoicing.

Information to be sent to SDR Portugal:

- vouchers issued and redeemed;
- transactions carried out.

7. Payments

7.1. Deposit amounts

The Deposit Amount will be reimbursed by SDR Portugal to the Collection Point Operators on a monthly basis, based on the information recorded regarding the number of packages collected and vouchers redeemed.

By the 10th of each month, all information relating to payments for the previous month will be made available, and Collection Point Operators will have the option to submit any correction requests within the following 5 days. From the 16th of each month, payments for the previous month will be made. Vouchers are valid for 1 year.

If there are any expired vouchers that have not been redeemed, they will be automatically debited.

7.2. Handling fee

SDR Portugal establishes the handling fees to be applied to the different types of Collection Points in order to reimburse the optimised cost of the service provided by them.

The table showing the approved *handling fees* is attached.

The amounts payable by SDR Portugal to Collection Point Operators are calculated based on the quantities of packaging collected at each collection point. This calculation is established automatically according to the information collected from the operational data of the RVM machines, in the case of Automatic Collection Points, and from the counting machines operating in the Counting and Sorting Centres, in the case of Manual Collection Points.

By the 10th of each month, all information relating to the previous month's payments will be made available, with Collection Point Operators having the possibility to submit any requests for corrections within the following 5 days. Payments for the previous month will be made from the 16th of each month.

7.3. Adaptation Costs (applicable only during the start-up phase)

For Automatic Collection Points that become operational by the end of the transition period, up to 120 days after the Go Live date, and that register on the SDR Portugal Portal by 28/02/2026, SDR Portugal will reimburse the costs of adapting the respective establishments to ensure the necessary conditions for the installation of the machines and storage area for the bags, in accordance with the results of the methodology developed by an independent entity.

8. Translated with DeepL.com (free version) **Audits**

SDR Portugal regularly conducts audits with the aim of promoting the continuous improvement of the DRS. An audit programme will be established and published annually, covering:

- RVM suppliers and certified RVM models;
- Automatic Collection Points;
- Manual collection points.

SDR Portugal may choose to carry out different types of specialised audits or opt for integrated audits covering various areas:

- Technical specifications and performance of RVM
- Requirements and performance of collection points
- Updating the handling value

In addition to the periodic audit programme, extraordinary audits are carried out whenever SDR Portugal deems it necessary in the event of deviations from the performance indicators of the collection points or the RVM installed, or in the context of investigating possible cases of fraud.

SDR Portugal may choose to carry out these audits using its own teams or through external and independent entities.

The audit programme will be structured to ensure geographical and typological representation of collection points and will be published by the end of each year.

Collection Point Operators and RVM machine suppliers are notified of the audit plan at least 10 working days before the scheduled date.

In turn, the results of each audit will be communicated within 5 working days of its completion. Collection Point Operators and RVM machine suppliers must analyse and respond within 5 working days of receipt, defining, where necessary, an appropriate action plan for the rapid and effective resolution of any problems detected.

In situations that jeopardise the performance of the DRS, SDR Portugal reserves the right to set a maximum deadline for resolution, not less than (...) days, which, once exceeded, may result in the application of a contractual financial penalty.

9. References



10. Version history

Version	Date	Summary of changes made
0.3	03/06/2025	Integration of contributions sent by retailers. General review.
0.4	25/06/2025	After final meeting with retailers.
0.5	18/07/2025	Minor adjustments to the text – clarifications and corrections.
0.6	26/09/2025	Inclusion of reference to unredeemed vouchers (point 7.1). Clarification of the condition for reimbursement of adaptation costs (point 7.3).
0.7	23/12/2025	Extension of the deadline for registering Collection Points for the purposes of eligibility for the support mechanisms provided for in point 7.3.
0.8	21/01/2026	Extension of the deadline for registering Collection Points for the purposes of eligibility for the support mechanisms provided for in point 7.3.