

**SDR
PORTUGAL**

INCENTIVE SYSTEM TO ACCELERATE IMPLEMENTATION OF THE DEPOSIT AND RETURN SYSTEM

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INDEX

Introduction.....	3
Definitions	4
Application Deadline.....	4
1. Incentive mechanism for the automation of the collection network.....	6
Purpose and intent.....	6
Amount	6
Deadlines to consider	6
Eligibility criteria.....	7
2. Co-funding mechanism for adapting collection points.....	8
Purpose and intent.....	8
Amount	9
Deadlines to consider	9
Classification of the Collection Point	10
Eligibility criteria.....	13

Introduction

The purpose of this document is to clarify for all interested parties the incentive mechanisms created to accelerate the implementation of a Deposit and Return System in Portugal.

SDR Portugal offers two incentive mechanisms for the implementation of the Deposit and Return System collection network:

- **Incentive mechanism for the automation of the collection network** – aimed at mitigating the risk of investment in RVM by pioneering automatic collection point operators;
- **Co-funding mechanism for adapting collection points** – aimed at co-funding the construction and adaptation work necessary for the installation of RVM at automatic collection points.

Both mechanisms are subject to a set of requirements, compliance with which is an essential condition for their allocation.

In order to assess compliance with these requirements, SDR Portugal reserves the right to carry out audits and/or request documentation proving that these requirements have been met, which are also detailed in this document.

Both mechanisms only provide for payments deferred over several years. Prospective collection point operators are advised to carefully assess the costs, risks and benefits associated with the installation, operation and maintenance of RVMs in order to avoid financial losses or other impacts.

Definitions

Cost RVM	Value of the RVM together with the associated financing costs, which amount to €21,000.00 (twenty-one thousand euros) for a ½ Euro pallet RVM and €27,000.00 (twenty-seven thousand euros) for a 1 Euro pallet RVM
Automatic Collection Handling Costs	€0,02896 (two point eight hundred and ninety-six cents) for 2026, periodically updated in line with the evolution of the actual costs of the 30% more efficient Collection Points
Fixed Component of Automatic Collection Handling Costs	€0,00926 (zero point nine hundred and twenty-six cents) for 2026, periodically updated in line with the evolution of the actual costs of the 30% more efficient Collection Points.
Commencement of Operations	Date of processing of the first package of the Deposit and Return System by RVM
Automatic Collection Point	Collection Point
SDR Portugal Portal	Digital service provided by SDR Portugal for managing member profiles and storing relevant information and data, accessible via the SDR Portugal website
Transition Period	Time period between 10 April 2026 and 9 August 2026
RVM	Reverse Vending Machine
SDR Portugal	SDR Portugal – Associação de Embaladores
Lifespan	8 years from the date of commencement of operations of the RVM

Application Deadline

- The deadline for applying for incentives to implement the deposit and return system is **23:59 on 28 February 2026**;
- Only applications from Collection Points whose pre-registration has been completed and submitted on the SDR Portugal portal by the deadline set out in the previous point, will be considered;

- Applications submitted within the specified deadline are subject to validation and approval by SDR Portugal.

1. Incentive mechanism for the automation of the collection network

Purpose and intent

The incentive mechanism for automating the collection network was designed by SDR Portugal with the aim of mitigating the risk of investment in RVM by pioneering collection point operators. In the initial design of the collection point network, it was recognised that some automatic collection points may not collect enough packaging to amortise the RVM during their lifespan. This possibility could lead collection point operators to delay the acquisition of RVMs, with clear operational losses for SDR Portugal and the efficiency of its logistics.

The incentive mechanism for automating the collection network thus aims to compensate collection point operators who, at the end of the eight-year lifespan of the RVMs installed at the start of the deposit and return system, have not been able to recoup the investment made in purchasing the first-generation RVMs through the handling fees paid for each package collected.

Amount

Once all cumulative eligibility criteria have been verified, SDR Portugal may cover up to 50% of the cost of the RVM for each Collection Point applying for this incentive mechanism for the automation of the collection network.

Deadlines to consider

- **Until 28 February 2026:** pre-registration of the Collection Point on the SDR Portugal portal, expressing interest in applying for the Incentive Mechanism for the automation of the collection network;
- **Until 9 August 2026:** Installation and activation of the Collection Point;
- **Between 10 April and 30 September 2034:** calculation and processing of any financial compensation paid under this incentive mechanism for the automation of the collection network.

Eligibility criteria

The incentive mechanism for automating the collection network applies exclusively to collection points:

- Install, operate and maintain ½ or 1 Euro palette RVM;
- Located in retail establishments with up to 999 m² of display and continuous sales area;
- Keep the RVM in operation during its lifespan, in the same location, with the same type/size of store;
- Whose RVM has an average uptime of at least 90% from the second year of operation, except for stoppages that cannot be attributed to the Collection Point operator;
- That do not collect the minimum amount of packaging necessary to cover the investment value defined by RVM type, as shown in the following table:

	½ Euro palette	1 Euro palette
Collection Point Type	Up to 999 m² of continuous exhibition and sales area	Between 400 m² and 999 m² of continuous exhibition and sales area
Minimum Collection	81.250 packaging/year	217.800 packaging/year
Value	Up to 50% of the RVM Cost, deducting the Fixed Component of the Automatic Collection Handling Costs paid over the Lifespan	
Calculation Formula	Minimum between: (a) 50% x €21,000.00 (b) €21,000.00 – (number of units collected during the lifespan x fixed component of automatic collection handling costs)	Minimum between: (a) 50% x €27,000.00 (b) €27,000.00 – (number of units collected during the lifespan x fixed component of automatic collection handling costs)
Scope	By Collection Point	

2. Co-funding mechanism for adapting collection points

Purpose and intent

The mechanism for co-funding of adapting collection points, aims to contribute to the costs of the construction and adaptations necessary for the installation of RVMs in collection points.

When the network of collection points was initially designed, it was recognised that some establishments required to collect all packaging under the deposit and return system would necessarily have to invest in adapting their premises to receive and operate RVMs.

These necessary investments for the adaptation of pre-existing commercial establishments constitute real context costs imposed on economic operators obliged to install collection points that necessarily require the automation of the collection of all packaging covered by the deposit and return system.

This mechanism also aims to accelerate the implementation of SDR Portugal's automated collection network, enabling SDR Portugal to operate its logistics with higher levels of efficiency. This mechanism is not dependent on the number of packaging items collected by each eligible collection point.

Amount

Once all cumulative eligibility criteria have been verified, SDR Portugal may cover up to 50% of the cost of the RVM for each Collection Point eligible for this incentive mechanism for the automation of the collection network

The co-funding amounts attributable through the co-funding mechanism for the adaptation of collection points by SDR Portugal are detailed in the following table:

	<i>Indoor</i>	<i>Indoor Car Park</i>	<i>Outdoor with cover</i>	<i>Exterior with Container</i>
Space Adaptation Costs				
Stand-alone (per RVM)	€2.648,00	€4.874,00	€13.397,00	€18.637,00
Modular (per RVM)	€11.353,00	€13.620,00	N/A	€43.570,00

The co-funding resulting from the co-funding mechanism for the adaptation of collection points to each Collection Point Operator is formalised through a contract between SDR Portugal and the Eligible Collection Point Operator, which sets the compensation to be awarded in accordance with the type of installation and the nature of the RVM installed.

Payment of the co-funding is subject to a grace period of 2 years from the end of the Transition Period.





Deadlines to consider

- **Until 28 February 2026:** pre-registration of the collection point on the SDR Portugal portal, expressing interest in applying for the co-funding mechanism for the adaptation of collection points;
- **Until 9 August 2026:** Installation and activation of the collection point;
- **Between 10 August and 30 September 2028:** calculation and processing of any financial compensation paid under this co-funding mechanism for the adaptation of collection points.

Classification of the Collection Point

The mechanism for co-funding of adapting collection points requires the classification of different types of collection points, which vary according to the nature and size of the RVM machine to be installed.

- Seven types of RVM installations have been defined, as shown in the following table:

1. Indoor	2. Indoor Car Park	3. Outdoor with cover	4. Exterior with Container
Installation of the RVM inside the commercial space (store or gallery), in an area accessible to the public, integration into the store layout, with less need for additional structure	Installation of the RVM in a covered area, but outside the main area of the store, such as covered underground car parks	Outdoor installation, equipped with a roof structure for protection against rain and sun, suitable for locations with less demanding protection requirements	Robust, enclosed outdoor installation, with a container-type structure or reinforced kiosk, designed to fully protect equipment and users
			
1.1. – Stand-alone	2.1. – Stand-alone	3.1. – Stand-alone	4.1. – Stand-alone
1.2. – Modular	2.2. – Modular	N/A	4.2. – Modular

- Types 3.1, 4.1 or 4.2 must meet the minimum criteria detailed in the following table:

Types of RVM	3.1. Outdoor with cover	4.1. or 4.2. Exterior with Container
Structure and Materials	<ul style="list-style-type: none"> – Modular structure in galvanised steel or equivalent material – Roof and walls in steel or equivalent material – Floor with coating in accordance with HACCP standards – Wall and ceiling panels with 30–40 mm insulation 	

Types of RVM	3.1. Outdoor with cover	4.1. or 4.2. Exterior with Container
	- Ventilation system and drainage gutter for adequate protection of the RVM	
Accessibility to the RVM	- With front access to the RVM (by the consumer); no doors to protect the packaging inlet, only a front protection grille can be installed	- No front access to the RVM (by the consumer); doors with security locks and/or electric shutter-type doors
Area	- N/A - No extra space (only for reject container)	- >6 m ² (based on RVM area + support infrastructure + handling) - Additional space for handling and support infrastructure
Technical infrastructure	- Fire extinguisher (if applicable) - Reject container (if applicable) - CCTV - Electrical (RVM) and telecommunications installation	- HVAC (if applicable for stand-alone RVMs; 100% for modular RVMs) - Smoke detector and fire extinguisher - Reject container (if applicable) - CCTV - Electrical (RVM and HVAC) and telecommunications installation

Note: if the materials in the compartment do not meet the minimum requirements, the collection point operator may request SDR Portugal to assess the actual characteristics of the installation in order to determine the amount of the Space Adaptation Cost to be reimbursed.

- Each type must meet the minimum requirements for RVM installation detailed in the following table::

1. Indoor	2. Indoor Car Park	3. Outdoor with cover	4. Exterior with Container
<u>Location:</u> Inside the commercial space (store or gallery), in an area accessible to the public	<u>Location:</u> Covered area, but outside the main store area, such as underground or covered car parks outside	<u>Local:</u> Outside the commercial space	<u>Local:</u> Exterior of the commercial space
<p>Required infrastructure:</p> <p>Stand-alone:</p> <ul style="list-style-type: none"> – Electrical and telecommunications installation – Reject container – CCTV (1 camera) <p>Modular:</p> <ul style="list-style-type: none"> – Construction, design and supervision – Electrical and telecommunications installation – Reject container – CCTV (1 camera) – HVAC 	<p>Required infrastructure:</p> <p>Stand-alone:</p> <ul style="list-style-type: none"> – Electrical and telecommunications installation – Reject container – CCTV (1 camera) – Firefighting equipment <p>Modular:</p> <ul style="list-style-type: none"> – Construction, design and supervision – Electrical and telecommunications installation – Reject container – CCTV (1 camera) – HVAC – Firefighting equipment 	<p>Required infrastructure:</p> <p>Stand-alone:</p> <ul style="list-style-type: none"> – Licensing – Construction, design and supervision – Compartment (open front) – Electrical and telecommunications installation – Rejected container – CCTV (1 camera) 	<p>Required infrastructure:</p> <p>Stand-alone and Modular:</p> <ul style="list-style-type: none"> – Licensing – Construction, design and supervision – Compartment (Complete container, closed on all sides) – Electrical and telecommunications installation – Rejected containers – CCTV (1 camera) – HVAC (if applicable for stand-alone RVMs; 100% for modular RVMs) – Firefighting equipment

Eligibility criteria

The co-funding mechanism for adapting collection points applies exclusively to collection points that meet the eligibility criteria detailed in the following table:

Topic	Criteria
RVM Type Indicated by Type of Establishment	<p>The value of the Space Adaptation Cost to be reimbursed by SDR Portugal was determined based on the type of RVM recommended for each store size, as detailed below:</p> <p>(a) Stores with a continuous display and sales area of less than 400 m²: RVM ½ Euro pallet.</p> <p>(b) Stores with a continuous display and sales area equal to or greater than 400 m² and inferior to 1,000 m²: Option 1 – RVM ½ Euro pallet; Option 2 – RVM 1 Euro pallet.</p> <p>(c) Stores with a continuous display and sales area equal to or greater than 1,000 m² and less than 2,500 m²: Option 1 – RVM 1 Euro pallet; Option 2 – RVM 2 Euro pallet.</p> <p>(d) Stores with a continuous display and sales area equal to or greater than 2,500 m² and less than 5,000 m²: Option 1 – RVM 2 Euro pallet; Option 2 – RVM 3 Euro pallet.</p> <p>(e) Stores with a continuous display and sales area equal to or greater than 5,000 m²: Option 1 – RVM 4 Euro pallet; Option 2 – RVM 5 Euro pallet.</p>
Cost of Adapting the Space to be Reimbursed by SDR Portugal by Type of Establishment	<p>The rationale for determining the value of the Space Adaptation Cost to be reimbursed by SDR Portugal is based on the type of establishment, as detailed below:</p> <p>(a) Stores with a continuous display and sales area of less than 400 m²: SDR Portugal only pays the cost of adapting space for stand-alone RVMs, regardless of the type of RVM actually installed.</p> <p>(b) Stores with a continuous display and sales area equal to or greater than 400 m² and less than 1,000 m²:</p>

Topic	Criteria
	<p>SDR Portugal only pays the cost of adapting space for stand-alone RVMs, regardless of the type of RVM actually installed.</p> <p>(c) Stores with a continuous display and sales area equal to or greater than 1,000 m² and less than 2,500 m²:</p> <p>SDR Portugal only pays the cost of adapting space for stand-alone RVMs, regardless of the type of RVM actually installed.</p> <p>(d) Stores with a continuous display and sales area equal to or greater than 2,500 m² and less than 5,000 m²:</p> <p>For Collection Points that install stand-alone RVMs, SDR Portugal will reimburse the amount of Space Adaptation Costs corresponding to this type.</p> <p>In cases where Collection Points opt for the installation of modular RVM, a review of the volumes of packaging collected will be carried out after two years of operation.</p> <p>(i) If the average annual volume justifies the installation of this type of RVM, i.e. if the average annual volume per RVM is above 980k packages collected, SDR Portugal will reimburse the cost of adapting the space for modular RVMs;</p> <p>(ii) Otherwise, the value corresponding to the type of RVM installed on a stand-alone basis shall apply.</p> <p>(e) Stores with a continuous display and sales area equal to or greater than 5,000 m²:</p> <p>Space adaptation cost value depending on the type of RVM (stand-alone or modular) actually installed.</p>
Cost of Adapting the Space to be Reimbursed by SDR Portugal by Type of Collection Point	<ul style="list-style-type: none"> – ½ Euro pallet: The cost of adapting the space to be reimbursed by SDR Portugal will only apply to indoor installations (RVM located inside the store) or indoor car parks (RVM located in the car park or outside) of the stand-alone type; – Other types of RVM: The cost of adapting the space will be determined based on the actual characteristics of the Collection Point, and whenever a Collection Point does not meet the minimum requirements for a type, the value to be assigned must correspond to the type immediately below it in terms of infrastructure.
Validation of the Collection Point and RVM Type	<ul style="list-style-type: none"> – Each Collection Point must upload photographs of the installed RVM and its installation site within six months of the system's start-up, in order to show the infrastructure involved and any additional components considered relevant; – SDR Portugal will carry out random audits to accredit the Collection Points, which may also be used to verify the Collection Points compliance in terms of the value attributed as Space Adaptation Cost.