

**SDR
PORTUGAL**

**INCENTIVE SYSTEM TO ACCELERATE THE
IMPLEMENTATION OF THE DEPOSIT AND REFUND
SYSTEM**

MARCH 2026

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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 Refund System in Portugal.

SDR Portugal offers two incentive mechanisms for the implementation of the deposit and refund system collection network:

- **Incentive for the automation of the collection network** – which aims to mitigate the risk of investment in *RVM* by pioneering automatic collection point operators;
- **Contribution to the adaptation of collection points** – which aims to contribute to 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, which are also detailed in this document, have been met.

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

Definitions

RVM cost	Value of the RVM together with the associated financing costs, which amount to €21,000.00 (<i>twenty-one thousand euros</i>) for ½ Europalette RVMs and €27,000.00 (<i>twenty-seven thousand euros</i>) for 1 Europalette RVMs.
Value of Handling of Automatic Collection	€0.02896 (<i>two point eight nine nine six</i>) for 2026, periodically updated in line with the evolution of the actual costs of the 30% more efficient PdRs
Fixed Component of the of Automatic Collection of Automatic Collection	€0.00926 (<i>zero point nine hundred and twenty-six cents</i>) for 2026, periodically updated in line with the evolution of the actual costs of the 30% more efficient PdRs
Start of Operation	Date of processing of the first transaction in the RVM with SDR packaging, after confirmation of the applicable operational requirements, defined in the SDR - RVM Technical Specifications, certified by a Verification Report issued by the RVM supplier
PdR	Collection Point (applicable to automatic)
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	Period between 10 April 2026 and 9 August 2026
RVM	<i>Reverse Vending Machine</i>
SDR Portugal	SDR Portugal – Association of Packaging Manufacturers
Useful life	8 years from the date of commencement of operation of the Collection Point

Eligibility Period

- The eligibility period for incentives for the implementation of the deposit and refund system **ends at 23:59 on 28 February 2026**;
- RCPs whose pre-registration is submitted on the SDR Portugal Portal within the period established in the previous point and for which **activation** is demonstrated **by 9 August 2026** will be considered eligible;
- Eligible PdRs are subject to validation and approval by SDR Portugal.

1. Incentive for the automation of the collection network

Purpose and objective

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 useful life.

This possibility could lead collection point operators to delay the acquisition of VMAs, with clear operational losses for SDR Portugal and the efficiency of its logistics.

The incentive mechanism for the automation of the collection network thus aims to compensate collection point operators who, at the end of the eight-year useful life of the VMAs installed at the start of the deposit and refund system, have not been able to recover the investment made in the acquisition of pioneering VMAs through the handling fees paid for each package collected.

Amount

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

Deadlines to consider

- **By 23:59 on 28 February 2026:** pre-registration of the PdR on the SDR Portugal portal;
- **Until 16 March 2026:** SDR Portugal sends confirmation by email to pre-registered PdRs that are eligible;
- **By 9 August 2026:** entry into operation of eligible PdRs;
- **Between 10 April and 30 September 2034:** calculation and processing of any financial compensation payable under this incentive mechanism for the automation of the collection network.

Eligibility criteria

The incentive mechanism for the automation of the collection network applies exclusively to automatic collection points that meet the following requirements:

1. Located in retail establishments with up to 999 m² of display and continuous sales area;
2. Installation of ½ or 1 Europallet RVM certified by SDR Portugal;
3. Pre-registration confirmed on the SDR Portugal Portal at 23:59 on 28 February 2026;
4. Applicable operational requirements, defined in the SDR Technical Specifications – RVM, certified by a Verification Report issued by the RVM supplier prior to entry into operation;

- Commencement of operation by 9 August 2026, confirmed by registration of the first transaction on the SDR Portugal Portal;

Proven operation of the RVM during its useful life (8 years), in the same PdR, with the same type/size of store;

- Average *uptime* of at least 90% from the 2nd year of operation¹, excluding stoppages that cannot be attributed to the PdR operator, provided that they are formally communicated to SDR Portugal (ratio of "number of Vending Machine operating hours" vs "number of annual hours of operation of the establishment");
- Average annual value of the quantities of packaging taken back lower than the minimum collection required to cover the investment value defined by type of RVM, as shown in the following table:

Incentive for automation of the collection network	½ Euro pallet	1 Europallet
Type of PdR	Up to 999 m ² of display and continuous sales area	Between 400 m ² and 999 m ² of continuous display and sales area
Minimum collection	81,250 packages/year	217,800 packages/year
Incentive value	Up to 50% of the RVM cost	
Maximum reference value per RVM type ²	€21,000	€27,000
Calculation formula	Minimum between: (a) 50% x €21,000.00; (b) €21,000.00 – (number of units collected during the useful life 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 useful life x fixed component of automatic collection handling costs).
Coverage	Per PdR	

¹ 10 April 2027

² The RVM Cost value indicates the maximum ceiling for calculating the incentive amount to be shared, which will be determined based on the actual amount paid by the PdR Operator, upon proof of payment.

2. Contribution towards the adaptation of collection points

Purpose and objective

The co-funding mechanism for adapting collection points aims to co-fund the construction and adaptation work necessary for the installation of reverse vending machines (RVM) in PdR.

In the initial design of the collection point network, it was recognised that some establishments required to collect all packaging under the deposit and refund system would necessarily have to invest in adapting their premises to receive and operate RVM.

These investments necessary 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 refund 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 packages collected by each eligible collection point.

Amount

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

	Indoor/Interior	Parking/Indoor car park	Outdoor with cover	Outdoor with Container
Space Adaptation Costs³				
Stand-alone (by RVM)	€2,648	€4,874.00	€13,397	€18,637.00
Modular (by RVM)	€11,353.00	€13,620.00	N/A	€43,570

The mechanism for co-funding the adaptation of collection points for each Collection Point Operator is communicated by SDR Portugal to the Eligible Collection Point Operator, indicating the criteria according to the type of installation and the nature of the RVM installed, as well as the established deadlines.

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

³ The costs of adapting the established space indicate the maximum ceiling for calculating the compensation amount to be awarded, which will be determined based on the actual amount paid by the RPO, upon presentation of proof of payment.

Deadlines to be considered

- **Until 28 February 2026:** pre-registration of the PdR on the SDR Portugal portal;
- **Until 16 March 2026:** SDR Portugal sends confirmation to pre-registered PdRs that are eligible;
- **By 9 August 2026:** Installation and activation of the PdR;
- **By 31 December 2026:** SDR Portugal informs each PdR of the calculated amount of the subsidy to be paid by 30 September 2028;
- **Between 10 August and 30 September 2028:** calculation and processing of any financial compensation to be paid under this co-payment mechanism for the adaptation of collection points.

Classification of PdR

The co-payment mechanism for the adaptation of 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, as described below.

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

1. Indoor	2. Car park/Indoor car park	3. Exterior with roof	4. Exterior with container
installation of RVM in inside the commercial space (shop or gallery), in an area accessible to the public, integration into the shop <i>layout</i> , with less need for additional structure	RVM installation in a covered area, but outside the main area of the shop, such as car parks covered underground car parks	Installation outdoor outdoor, equipped with a a covering structure for rain and sun protection, suitable for locations with less demanding of protection	Robust outdoor installation and closed, with a structure similar to or kiosk reinforced, designed to fully protect the 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:

RVM type	3.1. Outdoor with cover	4.1. or 4.2. Outdoor with container
Structure and Materials	<ul style="list-style-type: none"> - Modular structure in galvanised steel or equivalent material - Roofing and walls made of steel or equivalent material - Flooring with HACCP-compliant coating - Wall and ceiling panels with 30-40 mm insulation - Ventilation system and drainage gutter for adequate protection of the RVM 	
Accessibility to the RVM	<ul style="list-style-type: none"> - With front access to the RVM (by the customer): no doors to protect the entrance of packaging, only a front protection grille may be installed 	<ul style="list-style-type: none"> - No front access to the RVM (by the customer): doors with security locks and/or electric shutter-type hatch
Area	<ul style="list-style-type: none"> - N/A - No additional space (only for reject container) 	<ul style="list-style-type: none"> - >6 m² (based on the area of the RVM + support infrastructure + handling) Additional space for handling and support infrastructure
Technical infrastructure	<ul style="list-style-type: none"> - Fire extinguisher (if applicable) - Container for rejects (if applicable) - CCTV - Electrical (RVM) and telecommunications installation 	<ul style="list-style-type: none"> - HVAC (if applicable for <i>stand-alone</i> RVM; 100% for modular RVM) - Smoke detector and fire extinguisher - Waste container (if applicable) - CCTV - Electrical installation (RVM and HVAC) and telecommunications

Note: if the materials in the compartment do not meet the minimum requirements, the PdR 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.

- The minimum requirements for RVM installation are detailed in the following table:

1. Indoor	2. Indoor car park	3. Outdoor with cover	4. Outdoor with Container
<u>Location:</u> Inside the space commercial (shop or gallery), in an area accessible to the public	<u>Location:</u> Covered area, but outside the main area of the shop, such as car parks car underground underground or covered in outside	<u>Location:</u> Outside the venue commercial	<u>Location:</u> Outside the commercial space commercial
Required infrastructure: Stand-alone:	Required infrastructure: Stand-alone:	Required infrastructure: Stand-alone:	Required infrastructure: <i>Stand-alone</i> and Modular:

1. Indoor	2. Indoor car park	3. Outdoor with cover	4. Outdoor with Container
<ul style="list-style-type: none"> – Electrical and telecommunications installation – Rejected container – CCTV (1 camera) <p>Modular:</p> <ul style="list-style-type: none"> – Construction, design and supervision – Electrical installation and telecommunications – Rejected container – CCTV (1 camera) – HVAC 	<ul style="list-style-type: none"> – Electrical and telecommunications installation – Waste container – CCTV (1 camera) – Firefighting equipment <p>Modular:</p> <ul style="list-style-type: none"> – Construction, design and supervision – Electrical and telecommunications installation – Waste container – CCTV (1 camera) – HVAC – Firefighting equipment 	<ul style="list-style-type: none"> – Licensing – Construction, design and supervision – Compartment (open front) – Electrical and telecommunications installation – Waste container – CCTV (1 camera) 	<ul style="list-style-type: none"> – Licensing – Construction, design and supervision – Compartment (Complete container, closed on all sides) – Electrical and telecommunications installation – Rejected container – CCTV (1 camera) – HVAC (if applicable for <i>stand-alone</i> 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	Criterion
Category of RVM Indicated by Type of Establishment	<p>The value of the Space Adaptation Cost to be co-financed by SDR Portugal was determined according to the type of RVM recommended by store size, as detailed below:</p> <ul style="list-style-type: none"> (a) Shops with a display and continuous sales area of less than 400 m²: RVM ½ Europallet. (b) Shops with a continuous display and sales area equal to or greater than 400 m² and less than 1,000 m²: Option 1 – RVM ½ Euro pallet; Option 2 – RVM 1 Euro pallet. (c) Shops 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 Europallet. (d) Shops with a continuous display and sales area equal to or greater than 2,500 m² and less than 5,000 m²:

Topic	Criterion
	<p>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>
<p>Cost of Adapting the Space to be Reimbursed by SDR Portugal by Type of Establishment</p>	<p>The rationale for determining the amount of the Space Adaptation Cost to be reimbursed by SDR Portugal is based on the type of establishment, as detailed below:</p> <p>(a) Shops with a display and continuous sales area of less than 400 m²: SDR Portugal only pays the cost of adapting space for <i>stand-alone</i> RVM, regardless of the type of RVM actually installed.</p> <p>(b) Shops with a continuous display and sales area equal to or greater than 400 m² and less than 1,000 m²: SDR Portugal only pays the cost of adapting space for <i>stand-alone</i> RVMs, regardless of the type of RVM actually installed.</p> <p>(c) Shops with a continuous display and sales area equal to or greater than 1,000 m² and less than 2,500 m²: SDR Portugal only pays the cost of adapting the space for <i>stand-alone</i> RVMs, regardless of the type of RVM actually installed.</p> <p>(d) Shops with a continuous display and sales area equal to or greater than 2,500 m² and less than 5,000 m²: For PdRs that install <i>stand-alone</i> RVM, SDR Portugal will reimburse the Space Adaptation Costs corresponding to this type. In cases where PdRs opt to install modular RVMs, the volumes of packaging collected will be reviewed after two years of operation: (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; (ii) Otherwise, the amount corresponding to the type of RVM installed on a <i>stand-alone</i> basis shall apply.</p> <p>(e) Shops with a continuous display and sales area equal to or greater than 5,000 m²: Space Adaptation Cost amount depending on the type of RVM (<i>stand-alone</i> or modular) actually installed.</p>
<p>Space Adaptation Cost to be Reimbursed by SDR Portugal by Type of PdR</p>	<ul style="list-style-type: none"> – ½ Europalette: The Space Adaptation Cost to be reimbursed by SDR Portugal will only apply to indoor installations (RVM located inside the shop) or indoor car parks (RVM located in the car park or outside) of the <i>stand-alone</i> type; – Other types of RVM: The cost of adapting the space will be determined based on the actual characteristics of the PdR, and whenever a PdR does not meet the minimum requirements for a type, the amount to be allocated must correspond to the type immediately below in terms of infrastructure.

The validation of the PdR and RVM type will be carried out based on the analysis of evidence:

- Each PdR must upload photographs of the installed RVM and its installation location within 6 months of the system start-up, in order to show the infrastructure involved and any additional components considered relevant;

- Sampling audits will be carried out by SDR Portugal for the accreditation of PdRs, which may also be used to verify the compliance of the PdR in terms of the value assigned as Space Adaptation Cost.

3. Audits

For the purposes of approving the incentive for the automation of the collection network and the compensation value for the adaptation of collection points, SDR Portugal will conduct audits.

To this end, proof of expenditure for the purchase of machines and adaptation of facilities will be requested in due course, as well as evidence of the installation conditions of the RVM.

The measurable parameters will be assessed based on data collected annually on the SDR Portugal Portal.

The expenses presented and the installation conditions of the RVM will be verified through a verification procedure and audits to be communicated by 30 September 2026.

4. version history

Version	Date	Summary of changes made
1	21/01/2026	Preparation and general review
2	04/02/2026	Eligibility Criteria – Calculation of Value
3	25/02/2026	Clarification of the concept of “entry into operation”. Harmonisation of the term "eligibility" instead of "application". Clarification of the concept of acceptable <i>uptime</i> for eligibility. New point “3. Audits”.