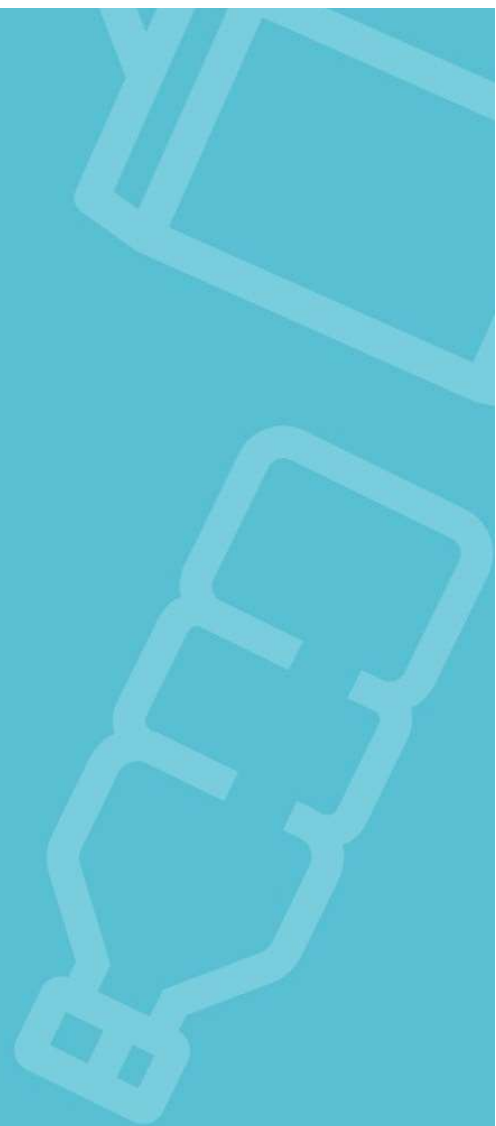


**SDR  
PORTUGAL**



## **PACKER'S MANUAL**

**DEPOSIT AND RETURN SYSTEM**

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DRS Glossary	
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DRS Technical Specifications - PET bottles	
Technical Specifications DRS - CANS	
Technical Specifications DRS - Labelling	
Guide to the DRS Information System - Packers and Authorised Representatives	
DRS Adhesion Contract - Packers	
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(...)	

## Introduction

The Packer's Manual is a technical document associated with contracts with Packers and Authorised Representatives, which provides practical guidelines for joining the DRS and for interacting with SDR Portugal.

This manual will be regularly reviewed and updated.

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

SDR Portugal also makes answers to "[Frequently Asked Questions](#)" available on [SDRPortugal.pt](#), in order to provide help on how the DRS and its processes work, and ensures that they are updated regularly.

*This document is only valid in the digital version available at [SDRPortugal.pt](#). If you choose to read a printed or saved version, make sure it corresponds to the most up-to-date version available online.*

*Access to this document is restricted and subject to express authorisation by [SDR Portugal](#). Its contents may not be disclosed to third parties.*

## Packaging covered

The Deposit and Refund System (DRS) covers non-reusable primary beverage packaging made of plastic, ferrous metals and aluminium with a volume of less than 3 litres, which is placed on the national market .

For this purpose, the following categories of drinks are considered :<sup>1</sup>

- a) Mineral and spring waters;
- b) juices and nectars, whether pre-packaged or freshly squeezed
- c) Fruit and vegetable mixes;
- d) Concentrates for dilution;
- e) Soft drinks, including tea, coffee and herbal teas;
- f) Energy and isotonic drinks;
- g) Beer, cider and alcoholic mixes.

excluding:

- (i) service packaging, such as bottles for filling with freshly made juices;
- (ii) primary packaging for drinks containing more than 25 per cent ingredients of dairy origin;
- (iii) packaging which, for exceptional and duly substantiated reasons, does not have characteristics compatible with the DRS, i.e. which does not fulfil the technical specifications.

For a better understanding of the scope of the DRS, it should be noted that “placing on the market<sup>2</sup>” corresponds to the first making available or transaction, on the national market, for a consideration or free of charge, of a product, as a professional activity, by the respective packager or importer, in their own name or under their brand.

Therefore, it is important to clarify that drinks that meet the above criteria, made available through promotions, sponsorships, offers or internal consumption in companies, are considered “placed on the market” and are therefore also covered by the DRS and obliged to apply the deposit value.

On the other hand, laboratory samples, non-compliant or expired products and products withdrawn from the market are not considered “placed on the market” and are therefore not covered by the DRS.

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<sup>1</sup> Article 30b of Decree-Law no. 152-D/2017, of 11 December, as amended (no. 2)

<sup>2</sup> Article 30b of Decree-Law no. 152-D/2017, of 11 December, as amended (no. 1)

## Packaging identification

The packaging covered by the DRS is identified on the basis of a unique global identification code for each product, representing the type of product, the brand, the company responsible, the format, the material and the capacity of each type of packaging.

For this purpose the code GINT<sup>3</sup> is used in accordance with the registration rules defined by the GS1 system. For the purposes of labelling products (and their packaging) covered by the DRS, labelling using EAN<sup>4</sup> (EAN8 and EAN13) or UPC<sup>5</sup> (UPC-A and UPC-E) barcodes is accepted, in addition to two-dimensional codes (GS1 Data Matrix and GS1 QR Code).

All barcodes for marking packaging must comply with the specifications and standards established by this organisation and conform to ISO/IEC 15420<sup>6</sup> and, with regard to print quality, ISO/IEC 15416.<sup>7</sup>

At the same time, for simple and immediate identification of packaging registered with the DRS and subject to payment of the deposit amount, it is compulsory to mark it with the Volta symbol, a trademark registered by SDR Portugal, strictly authorized for Packers adhering to the DRS, under the contractual terms established.

### New DRS Barcode

For the DRS to come into operation, packaging covered by the DRS must be marked with new codes in order to prevent the risk of fraud. New codes are those that have not previously been associated with articles placed on the market. Reusing old code is not allowed.

Exceptionally, for reasons of seasonality or volume, packers wishing to mark with pre-existing barcodes will have to sign a specific contract with SDR Portugal, paying the financial instalment and deposit amount, plus a penalty on the amount of this compensation. These exceptional situations require explicit approval from SDR Portugal and it is necessary to ensure that after the start of DRS all products in these circumstances have the Volta symbol and charge the deposit amount

In addition, if the number of packages collected exceeds the number of packages declared, packers are obliged to pay compensation to SDR Portugal in the proportion corresponding to the deviation found, plus a penalty on the amount of this compensation.

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<sup>3</sup> Global Trade Item Number

<sup>4</sup> European Article Number

<sup>5</sup> Universal Product Code

<sup>6</sup> ISO/IEC 15420:2009 Information technology - Automatic identification and data capture techniques - EAN/UPC bar code symbology specification

<sup>7</sup> ISO/IEC 15416:2016 Automatic identification and data capture techniques - Bar code print quality test specification - Linear symbols

## National" Codes and "International" Codes




**It is recommended that packaging covered by the DRS be identified using exclusive codes for the Portuguese market ("National" Codes)**

Exceptionally, Packers may choose to use codes that are not exclusive to the national market ("International" codes), assuming responsibility for compensating SDR Portugal for any losses. If the number of Packages collected and registered in the Information System exceeds the number of Packages declared, Packers are obliged to pay compensation to SDR Portugal in the proportion corresponding to the deviation found, plus a penalty on the value of this compensation.


## Secondary marking with self-adhesive labels

Packers may use self-adhesive labels to mark packages, but it is recommended that this option be applied only in exceptional situations:

No change to the identification code (GTIN / Barcode):

-  the original label does not have the Volta symbol;
-  the barcode printout does not comply with the rules required for automatic reading,
-  imported products that require mandatory consumer information to be translated into Portuguese;




With change of identification code (GTIN / Barcode):

-  the packager wants to change an "international" barcode into a "national" barcode, exclusive to the national market, in order to reduce the risk of fraud.

Packers who choose to use self-adhesive labels contractually assume responsibility for compensating SDR Portugal for any losses. If the number of Packages collected and registered in the Information System exceeds the number of Packages declared, Packers are obliged to pay compensation to SDR Portugal in the proportion corresponding to the deviation found, plus a penalty on the amount of this compensation.

## Acceptance criteria for packaging

The packaging included in the DRS must respect compatibility with the technologies and processes adopted for the high-quality collection, separation, sorting and recycling of used materials, with reference to:

-  technical parameters arising from automatic processes for recognising and collecting packaging through reverse vending machines (RVM);
-  technical parameters arising from the processes of separating and sorting materials and preparing them for recycling;
-  recyclability criteria compatible with high-quality recycling of the packaging materials collected.

To this end, the DRS has established the technical specifications for accepting packaging into the DRS:

*[DRS Technical Specifications - PET Bottles](#)*

*[DRS Technical Specifications - CANS](#)*

*[DRS Technical Specifications - Labelling](#)*

The technical specifications for packaging are validated and defined by the APA and the DGAE, on a proposal from SDR Portugal<sup>8</sup> and will be updated as a result of changes to the regulations and whenever justified by developments in the beverage packaging market or in the technologies for collecting, separating, sorting and recycling the materials used.






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<sup>8</sup> Article 30I of Decree-Law no. 152-D/2017, of 11 December, as amended (no. 1)

## Transition Period

The Transition Period is the period after the operational start-up of the DRS ("DRS Go Live") in which the placing and making available on the market of beverages with Volta packaging and with "pre-DRS" packaging can coexist

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

-  guarantee consumer confidence,
-  fulfil the collection targets,
-  prevent situations where the supply of products on the market is disrupted
-  avoid loss of materials or already packaged products,
-  prevent fraud situations that could jeopardise the DRS financially.

The guidelines for the transition period and the transition timetable are presented at [Guide to the DRS Transition Period](#), available at [SDRPortugal.pt](https://sdrportugal.pt).

## Registration of Packers and Subscription Contract

Packagers and Authorised Representatives who place packaging covered by the DRS on the domestic market and who meet the technical specifications for accepting packaging into the DRS enter into a contract with SDR Portugal for the transfer of responsibility for the management of packaging waste.

To do this, each Packer or Authorised Representative must first register on the SDR Portugal Information System, available in the dedicated Packers area on [SDRPortugal.pt](https://sdrportugal.pt).

The registration process for Packers and Authorised Representatives is carried out in several stages:

- 1 Registration of the Parent Company and creation of a key user account;
- 2 Identification of the company (or its subsidiaries) as Packer or Authorised Representative;
- 3 Registration of each Packer or Authorised Representative and transfer of the contract to be established with SDR Portugal
- 4 Packaging registration;
- 5 Completion of the packaging registration and approval process.

When registering the company as a Packer or Authorised Representative under the DRS, it will be necessary to digitally sign the contract that will be made available on the portal itself. This digital signature will require a Digital Mobile Key or a Qualified Digital Signature Certificate, which proves not only the veracity of the signature, but also that the person signing has the power of attorney from the represented company

A detailed description of each registration stage is given in the [Guide for DRS Information System - Authorised Packagers and Representatives](#).

The draft basic contracts to be signed with SDR Portugal are available here:

[DRS Adhesion Contract - Packers](#)

[DRS Adhesion Contract - Authorised Representatives](#)

Under the terms of the contract, SDR Portugal grants participating packagers a licence to use the Volta brand to identify their participation in DRS and to mark accepted packaging. For this purpose, the technical drawings and rules for their use are available in the [Communication Guide for Adhering Packagers](#).

## Packaging registration and approval

Packaging will be registered in full on the website provided by SDR Portugal. This requires the prior registration of users and the companies responsible for placing the packaging on the market, packers or authorised representatives. All these registrations need to be approved by SDR Portugal in order to confirm the accuracy and comprehensiveness of the information.

Packers who place beverages covered by the DRS on the domestic market must apply for registration of these products and their packaging using the application provided by SDR Portugal on its website, [SDRPortugal.pt](https://sdrportugal.pt). This registration must be made at least 30 days before the Packaging is placed on the market.

To start the DRS, packaging registration will be carried out in two stages:

- 🗑️ From the end of April 2025, packaging on the market whose products fall within the scope of the DRS will have to be registered;
- 🗑️ As soon as possible after the start of the system, and as soon as the new packaging and labels that will be part of the DRS have been developed, it will be necessary to register this packaging.

Packages can be registered individually ("one by one") or by uploading information on several packages en masse from a ".csv" file generated by the Packager or their Authorised Representative, both of which will be available simultaneously from the end of April 2025.

Registering packaging requires a set of information that can be divided into 4 main areas:

- 🗑️ Product identification,
- 🗑️ Basic characterisation (dimensions, weight, material, etc.),
- 🗑️ Booking,
- 🗑️ Recyclability (materials, glues, printing, etc.).

All the attributes to be registered can be consulted in the [Guide to Registering in the DRS Information System - Packers and Authorised Representatives](#).

All packaging needs to be approved by SDR Portugal in order to guarantee the efficiency of the collection process and the quality of the recycling. The process of registering and approving packaging for inclusion in the DRS has three components:

1. Verification of conformity based on the information provided and self-assessment by the Packer or Authorised Representative;
2. Tests proving their correct and efficient acceptance in automatic packaging collection equipment (RVM);

3. Technical verification of the packaging and, where appropriate, laboratory confirmation of the information recorded by the Packers or Authorised Representatives.

To this end, for each reference, during the registration process, sets of 3 samples of empty packaging must be sent, corresponding to replicas of the packaging sent to the market, including the labelling, lid or other components that make up the packaging as it is marketed, to SDR Portugal, as well as to each RVM Supplier certified by SDR Portugal .<sup>9</sup>

Each set of samples must be duly packaged in such a way as to preserve their shape and maintain the integrity of the components of each package. The packages must be empty and, where applicable, properly sealed with the respective lid. The [Instructions for Sending Samples](#) indicate the addresses, the rules for packing the packages, the labels for identifying the Packer or Authorised Representative and the products, and the other procedures for sending.

RVM suppliers will indicate directly on the SDR Portugal Portal the success or failure of the tests carried out, and all situations of failure in the respective tests must be dealt with on a case-by-case basis and with the intermediation of SDR Portugal.

With regard to laboratory confirmation of the information provided, this will be subcontracted by SDR Portugal to a third party with the necessary expertise. A (digital) archive will be kept of the samples received and tests will be carried out according to the audit programme to be defined annually.

It is important that packaging is registered as far in advance as possible of entering the market and before mass production begins, bearing in mind that the approval process must take into account the possibility of changes being made to the proposed packaging if it does not meet all the essential requirements for the efficiency of the collection process and for ensuring that it is recycled to the quality standards required by law and by the requirements for packaging approval. Although these degrees of uncertainty and unpredictability must be taken into account in the process, there is a commitment to a maximum response time from the organisations involved in the packaging certification process:

- SDR Portugal: 5 working days from the date of registration;
- Laboratory certifying body: 12 working days from receipt of samples at SDR Portugal;
- RVM suppliers: 5 working days from the date of receipt of the samples.

In atypical periods, for example in preparation for the start-up of the system, or in special circumstances, different response times may be set temporarily, duly communicated and justified to producers/distributors.

In the run-up to the system's launch and in order to speed up the process of registering and accrediting packaging, this process will have some special features:

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<sup>9</sup> For the start-up phase of the DRS in Portugal, 5 RVM suppliers are expected to be certified.

- All packaging on the domestic market must be registered, for products that fall within the scope of the DRS, for products on the market or to be introduced by 31/12/2025.
- These packages, which will not be part of the DRS, will have a special "register" process that will only indicate whether or not they fulfil the requirements of the DRS, justifying the reasons for any non-compliance.
- In cases where the packaging on the market in 2025 already complies with the DRS requirements and will not be altered beyond the replacement of the barcode and the placement of the Volta symbol (keeping the dimensions of the barcode and the colours, dimensions and materials of the label), the approval process for the new packaging will be simplified and the packaging will not need to be resubmitted. In these situations only:
  - Confirm that nothing has changed on the new packaging apart from the barcode and the placement of the Volta symbol;
  - Upload of the drawings with the planning of artworks;
  - Enter the new barcode.
- In all other cases, it is considered to be new packaging and should follow the normal registration and approval process.

In addition to the production of manuals, training will be provided on the process and the use of the computer system.

All the entities involved in this process have strict duties of confidentiality and protection of information and packaging samples, contracted through an NDA (*Non Disclosure Agreement*).

## Periodic Declarations and Reports

Packers and Authorised Representatives must provide SDR Portugal with all the information necessary for the proper management of the packaging they place on the market. All declarations and reports are submitted in electronic format on the SDR Portugal website.

The information to be provided includes:

### Initial declaration with the signing of the Contract

i) The quantities and types of Packaging placed on the domestic market in the 1st year of the Contract will be calculated on the basis of the sum resulting from the communication of:

- for pre-existing products - number of units for each reference (GTIN code) placed on the domestic market in the year prior to the year to which the declaration relates
- for new products - estimate of the number of units for each reference (GTIN code) to be placed on the market in the year to which the declaration relates.

### Annual declaration by on 15th March of each following year

i) Quantities and types of Packaging placed on the domestic market after the 1st year of the contract will be calculated on the basis of the sum resulting from:

- number of units for each reference (GTIN code) placed on the domestic market in the previous year.
- ii) Description of participation in awareness-raising, communication and education campaigns aimed at final consumers and other stakeholders within the scope of the DRS;
- iii) A description of the measures taken to prevent the production of packaging waste.

### Monthly declaration of packaging placed on the market by the 15th of each month

(under development)

i) Quantities and types of Packaging placed on the domestic market in the previous month will be calculated based on the sum resulting from:

- number of units for each reference (GTIN code) placed on the domestic market in the previous month
- deposit amount charged

## Payments to DRS Portugal

### Deposit amounts

The Deposit Amounts in force determined by Order of the members of the Government responsible for the areas of economy and environment **(awaiting publication)**, which established the application of a single deposit value, regardless of the material or capacity of the packaging:

*0.10 € / unit (bottle or can).*

Packers and Authorised Representatives are obliged to charge the Deposit Value for each package placed on the market, and must itemise the Deposit Value on their sales invoices, under the simplified designation "Deposit".



On a monthly basis, SDR Portugal invoices each Packer or Authorised Representative for the deposit amounts reported.

### Financial instalment values

The amount of the financial instalments to be paid by each Packer or Authorised Representative is calculated on the basis of the declarations of the quantities of packaging placed on the market.

The Financial Benefit will be invoiced in four equal quarterly instalments.

To calculate the amounts payable, the quantities declared by each Packer or Authorised Representative will be taken into account:

-  **in the 1st year of the Contract**, the amount to be paid will be estimated on the basis of the information reported in the **initial Declaration**, as part of the Packaging Registration and Declaration Form;
-  **in the second and subsequent years**, the amount to be paid will be estimated on the basis of the information reported in the **annual declaration** submitted in the same year, referring the previous year, and the amount paid in the previous year will be adjusted and corrected accordingly.

If the annual declarations are not submitted on time, or if their content is unreliable, insufficient or inaccurate, SDR Portugal may unilaterally determine the value of the financial instalment, estimated on the basis of the initial declaration or declarations submitted previously or the quantities actually collected.

If the number of Packages collected and registered in the Information System exceeds the number of Packages declared, Packagers and Authorised Representatives are obliged to pay compensation to SDR Portugal in the proportion corresponding to the deviation found, plus a penalty on the value of this compensation.

SDR Portugal plans to agree specific conditions for small packers or Authorised Representatives, to be announced in due course

## Registration values

The packaging registration process is subject to the payment of a Registration Fee for the submission of each application to register a new Packaging reference, which must be paid with the application.

## Penalties

The penalties applicable to the different situations described in the manual are presented in the annex *Payments to SDR Portugal* available at [SDRPortugal.pt](https://sdrportugal.pt). These penalties are applied cumulatively.

## Audits

SDR Portugal regularly carries out audits with the aim of promoting the continuous improvement of the DRS. Each year, a programme of audits will be established and publicised for the Packers and Authorised Representatives who adhere to the DRS, structured in such a way as to ensure their representativeness, as well as the representativeness of the materials, formats and capacities of the different packaging references they place on the market.

The audit plan must include verification of the information provided regarding:

- 🗑️ Declared packaging quantities;
- 🗑️ Packaging characteristics:
  - dimensions and weights,
  - marking requirements,
  - recyclability requirements;
- 🗑️ Measures to prevent the production of packaging waste.

In addition to the programme of periodic audits, extraordinary audits will be carried out whenever SDR Portugal sees the need to do so in the event of deviations from the performance indicators of the different packaging references.

SDR Portugal may carry out audits of Packers using its own teams or through external and independent organisations.

Packers or Authorised Representatives will be notified of the results of each audit within 5 working days of its completion, and must analyse and respond to them within 5 working days of receipt, defining, where necessary, an appropriate action plan for the rapid and effective resolution of the problems detected.

In the event of situations that jeopardise the DRS performance, SDR Portugal reserves the right to set a maximum deadline for its resolution, which, once exceeded, may result in the application of a financial penalty provided for in the contract.

## References

- 📄 EPBP (2024) - Design Guidelines <https://www.epbp.org/design-guidelines/products>
- 📄 EuPIA (2024) - Exclusion Policy for Printing Inks and Related Products, 6<sup>th</sup> Edition, March 2024  
[https://www.eupia.org/wp-content/uploads/2024/03/20240313-EuPIA\\_Exclusion\\_Policy\\_for\\_Printing\\_Inks\\_and\\_Related\\_Products\\_-\\_March-2024\\_6th-Edition-v1-1.pdf](https://www.eupia.org/wp-content/uploads/2024/03/20240313-EuPIA_Exclusion_Policy_for_Printing_Inks_and_Related_Products_-_March-2024_6th-Edition-v1-1.pdf)
- 📄 EuPIA (2018) - Questions and Answers on the EuPIA Exclusion Policy for Printing Inks and Related Products - updated Jun 2021 ([https://www.eupia.org/wp-content/uploads/2022/09/Q\\_A\\_on\\_the\\_EuPIA\\_Exclusion\\_Policy.pdf](https://www.eupia.org/wp-content/uploads/2022/09/Q_A_on_the_EuPIA_Exclusion_Policy.pdf))
- 📄 GS1 Portugal (2019) - GS1 User Manual, version 2.0, July 2019 -
- 📄 GS1 Portugal (2017) - Quality Guide for Symbology used at the Point of Sale (POS), Version 2.0, March 2017 -
- 📄 RecyClass (2024) - Design for recycling guideline list - Transparent Clear & Light-blue PET Bottles  
<https://recyclclass.eu/guidelines/clear-pet-bottles/>
- 📄 RecyClass (2024) - Technical review, 15 July 2024 <https://recyclclass.eu/wp-content/uploads/2024/07/Technical-Review-Colour-definition-PET-bottles-VF.pdf>
- 📄 Blue Guide 2016 on the Application of EU Product Rules (2016/C 272/01) from 26/07/2016 ([https://eur-lex.europa.eu/legal-content/PT/TXT/PDF/?uri=CELEX:52016XC0726\(02\)](https://eur-lex.europa.eu/legal-content/PT/TXT/PDF/?uri=CELEX:52016XC0726(02)))

## Version history



Version	Date	Summary of changes made