

**SDR  
PORTUGAL**



## **TRANSITION PERIOD SDR PORTUGAL**

**"NEW VERSION INCLUDES AN ADDENDUM WITH CLARIFICATIONS  
PROVIDED BY APA S047932-202608-DFEMR.DFEMR)"**

**GUIDE TO THE DRS TRANSITION PERIOD**

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## ADDENDUM (Circular No. 01/2026/DFEMR on July 24, 2026)

The update of Circular No. 01/2026/DFEMR on July 24, 2026, by the Portuguese Environment Agency (APA), has allowed for the sell-through of certain stocks of pre-system packaging still available on the market.

Thus, according to the Circular's update, *remaining stocks of packaging whose responsibility has already been transferred to SIGRE (Integrated Management System for Packaging Waste) **can be sold to the final consumer**, and their respective waste must be disposed of in the yellow recycling bin.*

Additionally, SDR Portugal requested further clarifications from APA, as per communication S047932-202608-DFEMR.DFEMR dated 13.08.2026, transcribed below, aiming to clarify doubts submitted by Adherent Packagers.

1. Are we speaking exclusively about the final consumer for the purpose of selling pre-system products until stocks are depleted? In other words, between companies (B2B channels), is this neither foreseen nor permitted?

**APA =>** *It is clarified that the possibility of marketing beverage packaging placed on the national market prior to the entry into force of the mandatory integration into the Deposit Return System for Beverage Packaging (SDR) aims to allow its sell-through along the commercial supply chain up to the final consumer. It is permitted to sell through what has already been made available for the first time in national territory and which was subject to the transfer of extended producer responsibility to SIGRE.*

**In other words, it is permitted along the commercial supply chain up to the final consumer.**

2. Was there an actual change in deadlines (except for producers/packagers)? Therefore, considering the 60-day deadline for placement on the market by producers/packagers, is the interpretation correct that the application of this amendment applies only to product stocks placed on the national market before June 10, 2026?

**APA =>** *The stipulated 60-day deadline applies to the placement on the national market of products in stock as of the date the mandatory integration into the DRS (Deposit Return System) entered into force—meaning, products manufactured or packaged before that date. Once this period expires, only products that comply with the requirements applicable to the Deposit Return System may be placed on the national market.*

**In other words, it applies to products for which the 1st invoice for distribution within the national territory is dated prior to June 10, 2026.**

**3. Is there no limit whatsoever to the sell-through period? Will products with a 24-month shelf life coexist on the shelves throughout 2027 alongside products with a deposit?**

**APA =>** *There is no maximum deadline foreseen for the sell-through of products that have been legally placed on the national market during the transitional period (...) it is permissible for them to coexist (...) depending on their respective commercial turnover and shelf life.*

**In other words, the deadline limit is determined by the shelf life.**

**4. How will the on-site validation be carried out to ensure that no product has been placed on the market after that date without a "Volta" deposit? This will make it very complicated to identify on the shelves who has complied or not (also considering inspections at Points of Return, typically by ASAE).**

**APA =>** *It is the responsibility of economic operators to ensure the retention of the documentary evidence necessary to demonstrate compliance with legal obligations, allowing inspection authorities to verify that products not integrated into the DRS do, in fact, benefit from the foreseen transitional regime.*

**In other words, the primary means of proof is the date of the invoices relating to the placement on the market, corresponding to the 1st invoice for distribution in the national market, regardless of whether it concerns producer brands, private labels, or imported products.**

**De:** Expediente Geral <geral@apambiente.pt>

**Enviado:** 13 de agosto de 2026 11:22

**Para:** SDR Portugal - Geral <geral@sdrportugal.pt>

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**Assunto:** FW: Circular APA - Período de transição | Questões Embaladores/Produtores\_S047932-202608-DFEMR.DFEMR - Nº S047932-202608-DFEMR.DFEMR #PROC: (608565) DRES.DGFEMR.00008.2024#

Ex.mos(as). Senhores(as),

Em resposta ao pedido de esclarecimento remetido por V. Exas., relativo à atualização da Circular n.º 01/2026/DFEMR, de 24 de julho de 2026, informa-se o seguinte:

Relativamente à primeira questão, esclarece-se que a possibilidade de comercialização de embalagens de bebidas colocadas no mercado nacional antes da entrada em vigor da obrigatoriedade de integração no Sistema de Depósito para Embalagens de Bebidas (SDR) visa permitir o respetivo escoamento ao longo da cadeia de comercialização até ao consumidor final. É permitido escoar o que já foi disponibilizado pela primeira vez em território nacional e que foi alvo de transferência da responsabilidade alargada do produtor para o SIGRE.

Neste contexto, após o termo dos prazos legalmente estabelecidos para a colocação no mercado nacional de embalagens de bebidas, apenas é permitida a colocação no mercado de novos produtos abrangidos pelo SDR, e com a aplicação do correspondente valor de depósito. As operações entre operadores económicos apenas poderão respeitar a produtos que tenham sido legalmente colocados no mercado nacional durante o período transitório aplicável (até 9 de junho 2026).

Quanto à segunda questão, importa referir que a atualização da Circular n.º 01/2026/DFEMR teve por objetivo clarificar o regime transitório aplicável ao escoamento dos produtos já colocados no mercado nacional, não alterando os prazos legalmente definidos para a colocação no mercado pelos produtores ou embaladores.

Assim, o prazo de 60 dias previsto aplica-se à colocação no mercado nacional dos produtos existentes em stock à data da entrada em vigor da obrigatoriedade de integração no SDR, ou seja, aos produtos produzidos ou embalados antes dessa data. Findo esse prazo, apenas poderão ser colocados no mercado nacional produtos que cumpram os requisitos aplicáveis ao Sistema de Depósito e Reembolso.

No que respeita à terceira questão, informa-se que não se encontra previsto um prazo máximo para o escoamento dos produtos que tenham sido legalmente colocados no mercado nacional durante o período transitório.

Deste modo, é admissível que coexistam no mercado produtos abrangidos pelo regime transitório e produtos integrados no SDR durante um determinado período, em função da respetiva rotatividade comercial e do prazo de validade, desde que os primeiros tenham sido colocados no mercado nacional em conformidade com os prazos legalmente estabelecidos.

O objetivo foi o de permitir que as embalagens colocadas no mercado antes da entrada em funcionamento do SDR fossem escoadas de forma faseada, evitando ruturas na cadeia de abastecimento e desperdícios desnecessários.

Relativamente à quarta questão, esclarece-se que a verificação do cumprimento das obrigações legais não assenta exclusivamente na observação dos produtos disponíveis nos pontos de venda.

As ações de fiscalização poderão recorrer aos elementos documentais e aos mecanismos de rastreabilidade existentes junto dos operadores económicos, designadamente registos de produção, faturação, expedição, distribuição e demais documentação comercial que permitam comprovar a data da colocação no mercado nacional das embalagens.

Neste âmbito, compete aos operadores económicos assegurar a conservação dos elementos documentais necessários à demonstração do cumprimento das obrigações legais, permitindo às entidades fiscalizadoras verificar que os produtos não integrados no SDR beneficiam, efetivamente, do regime transitório previsto.

Permitir que estas embalagens sejam comercializadas até ao esgotamento dos stocks evita a necessidade de as retirar prematuramente do mercado, o que poderia conduzir à destruição de embalagens e, sobretudo, das bebidas nelas contidas, não representa um impacto ambiental negativo, pois as embalagens em causa já foram devidamente declaradas no âmbito do SIGRE, cumprindo as obrigações de responsabilidade alargada do produtor e contribuindo financeiramente para a gestão do respetivo resíduo através do sistema integrado.

Com os melhores cumprimentos.

Agência Portuguesa do Ambiente

## 1 Introduction

<sup>1</sup>The purpose of this document is to provide all stakeholders in the Deposit and Refund System (DRS), whose regime is set out in Decree-Law No. 152-D/2017 of 11 December, in its current wording ("Decree-Law No. 152-D/2017"), guidelines for its implementation, in order to promote a gradual and progressive transition to this system.

The implementation of a gradual and progressive transition is the only way to reduce the need to destroy products already placed on the market, minimising waste and waste production, and ensuring best sustainability practices and the best indicators of convenience for the consumer.

Thus, in line with the practice followed in other European countries, a transition period is envisaged, beginning on the date of entry into operation of the DRS, in terms that allow for the progressive implementation of the DRS, without prejudice to compliance with the obligations arising from the applicable legislation, in particular Decree-Law No. 152-D/2017.

## 2 Transition Period

The Transition Period corresponds to the period immediately following the operational launch of the Deposit and Refund System ("**DRS Go Live**"), lasting [120 days], during which beverages with "**Volta**" packaging<sup>2</sup> and "**pre-DRS**" packaging<sup>3</sup> may coexist on the market.

This period will serve to clear pre-DRS packaging from the inventories of Packagers (Producers/Own Brand Holders/Importers) and from the inventories of Distributors, Wholesalers and Retailers in order to avoid supply shortages and prevent obsolescence.

A well-planned and smooth transition will help minimise costs and operational challenges for all parties involved and ensure that all DRS participants are aware of and comply with their obligations under the new System. More importantly, it will ensure that the timetable for implementing the DRS can be properly communicated to consumers.

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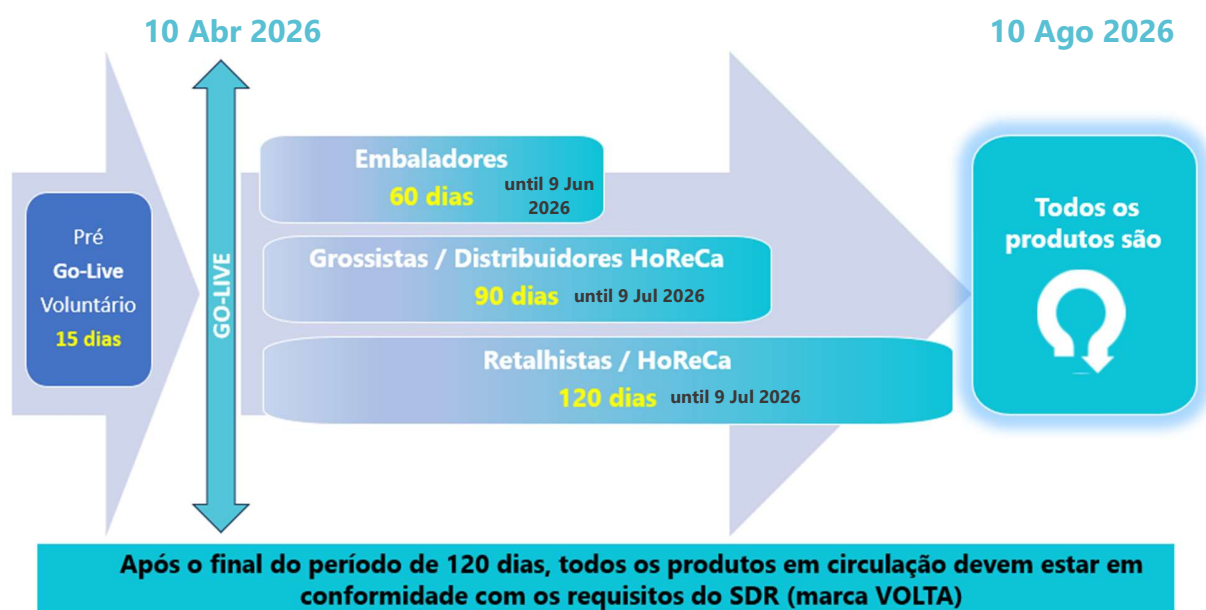
<sup>1</sup> The SDR covers non-reusable primary packaging for beverages made of plastic, ferrous metals and aluminium with a volume of less than 3 litres, which are placed on the market duly marked after the date of entry into operation of the deposit and refund system.

<sup>2</sup> That is, packaging registered on the SDR Portugal Portal, i.e., packaging for which compliance with SDR technical specifications has been verified and certified and the registration process has been successfully completed, appearing in the "Registered" status.

<sup>3</sup> That is, packaging existing on the market prior to adaptation to SDR technical specifications.

### 3 Transition Timetable<sup>4</sup>

#### Key dates:



#### Preparatory Period

All Packagers, Distributors, Wholesalers, Warehouse Operators, Retailers and HoReCa must take the necessary steps to adapt to the operational launch of the DRS and the transition period, coordinating the necessary mechanisms to reduce stocks of products with "pre-DRS" packaging to the bare minimum and contribute to the rapid disposal of "pre-DRS" inventories during the transition period.

The concerns and obligations regarding the disposal of "pre-DRS" products are exactly the same whether they are producer brands (Packagers-Producers) or distribution brands (Packagers-Distributors).

#### Pre-DRS Go-Live (15 days before operational start-up)

<sup>4</sup> According to Circular No. 01/2026/DFEMR, SDR transition period available at: [https://apambiente.pt/sites/default/files/\\_Residuos/FluxosEspecificosResiduos/Circulares/circular1\\_2026\\_sdr.pdf](https://apambiente.pt/sites/default/files/_Residuos/FluxosEspecificosResiduos/Circulares/circular1_2026_sdr.pdf)

Packagers may begin placing updated products with "Volta" packaging on the market through Distributors, Wholesalers, Stockists, and Retailers who can guarantee their storage prior to DRS *Go Live*, but may not sell or make them available to the end consumer.

*Pre-Go-Live* is voluntary and the individual responsibility of each Packager, subject to the acceptance of their customers.

*Pre-Go-Live* will allow pre-DRS codes to be replaced more quickly during the transition period, reducing exposure to obsolete products with pre-DRS packaging.

"Volta" packaging placed in the distribution chain at this stage is subject to the corresponding deposit charge and declared to the DRS in the declaration of packaging placed on the market.

### **SDR *Go Live***

The marketing of updated products with "Volta" packaging begins, subject to the payment of the deposit amount in each transaction for all parties involved:

- Packagers may place the packaging on the market without restrictions;
- Distributors, wholesalers and retailers begin selling products with "Volta" packaging;
- HoReCa establishments may begin selling products with "Volta" packaging;
- Consumers can start purchasing products with "Volta" packaging and return the empty packaging to collection points.

### **Up to 60 days after DRS *Go-Live***

Period during which Packagers may place products with "pre-DRS" packaging, without the "Volta" mark, on the market, with the aim of clearing inventories of both the final product and packaging materials.

During this phase of the transition period:

- Distributors, Wholesalers and Retailers must prioritise orders for products with "pre-DRS" packaging, with the aim of selling them quickly and in full, before moving on to orders for "Volta" packaging;
- no restrictions should be placed on the purchase of "pre-DRS" packaging, and priority should be given to the sale of this packaging in order to quickly clear the respective inventories.



### Up to 90 days after DRS Go-Live

Period during which Wholesalers and Distributors may keep products with "pre-DRS" packaging on their shelves and sell them, coordinating the necessary mechanisms to accelerate their sale, before placing packaging with the Volta brand on the shelves .

### Up to 120 days after SDR Go-Live

Deadline for Retailers and HoReCa to keep products with "pre-DRS" packaging on their shelves and sell them, putting in place the necessary mechanisms to accelerate their sale before placing packaging with the Volta brand on the shelves.

### After 120 days of SDR Go-Live

According to the update to [Circular No. 01/2026/DFEMR on July 24, 2026](#), by the Portuguese Environment Agency (APA), existing stocks with packaging covered by the transfer of responsibility to SIGRE can be sold to **final consumers**, and their waste must be disposed of in the yellow recycling bin.

## 4 Guidelines for an Efficient Transition

### Interpretation of the concepts of 'placing on the market' and 'making available on the market'

The concepts of placing on the market and making available on the market correspond to the definitions set out in Article 3(l) and (o) of Decree-Law No. 152-D/2017, respectively:

**"Placing on the market"** means the first making available of a product on the market, within the national territory, as a professional activity;

**"Making available on the market"** means the offering of a product for distribution, consumption or use on the market, within national territory, in the context of a commercial activity, whether for payment or free of charge.

These concepts should be interpreted in accordance with Circular No. 05/2021/DRES-DFEMR of the Portuguese Environment Agency, of November 2021, revised in August 2022 and January 2023.

### Planning

All Packagers and Distributors, Wholesalers, Retailers, Stockists and HoReCa must start planning for the transition period as soon as possible.

During the first phase of the transition period, up to 60 days after DRS *Go Live*, HoReCa Distributors, Wholesalers and Retailers should prioritise orders for the placing on the market of products with pre-DRS packaging, with the aim of accelerating the complete disposal of their stocks in the Packers' inventories, before transitioning to orders for Volta codes.

During the second phase of the transition period, between 60 and 90 days after DRS *Go Live*, HoReCa Distributors, Wholesalers, Retailers, Stockists and HoReCa should prioritise the distribution and/or sale of products with pre-DRS packaging on the market, with the aim of accelerating the complete disposal of their stocks in their respective inventories before transitioning to the sale of Volta packaging.

During the third and final phase of the transition period, between 90 and 120 days after SDR *Go Live*, HoReCa establishments and Retailers should prioritise the sale of products with pre-SDR packaging, with the aim of accelerating their complete disposal, before transitioning to orders for Volta packaging.

### **Employee training**

All Packagers and Distributors, Wholesalers, Retailers and HoReCa must provide training to their employees on the new DRS standards and procedures, using the training materials and content available on the SDR Portugal website.

### **Monitoring**

Sales and inventories of products with "pre-DRS" packaging and Volta packaging must be properly monitored to ensure that everything is in compliance within the established deadlines.

Packagers must make every effort to accelerate the sale of pre-DRS products during the transition period, across the different channels (Retail and HoReCa).

### **Disclosure**

Packagers and distributors, wholesalers, retailers and HoReCa must promote the dissemination of communication materials about the SDR and the Volta brand, with clear information on the rules for charging the deposit and its refund upon delivery of the respective packaging to a collection point.

In this context, the guidelines, key messages and graphic supports for harmonised communication with the end consumer, to be made available by SDR Portugal, must be respected.

## Communication

Close communication between packers and distributors, wholesalers, retailers and HoReCa is crucial to ensure a well-coordinated transition and avoid obsolete pre-DRS codes.

Coordination between the different elements of the supply chain is critical when pre-DRS packaging runs out and the switch to Volta packaging takes place for each item, as this will naturally happen on different days for different items. Failure to communicate effectively will result in possible disruptions, problems for logistics operations and the blocking of administrative processing of invoicing documents.

All relevant partners must be informed about the new system and collaborate in sharing information about the DRS and the rules for the transition period. To this end, SDR Portugal will promote a communication campaign and provide appropriate communication materials and content, taking into account the multiplicity of entities with different needs.

## Version history



| Version | Date        | Summary of changes made                                                                             |
|---------|-------------|-----------------------------------------------------------------------------------------------------|
| V2.0    | 11/03/2026  | Reference to Circular No. 01/2026/DFEMR, SDR Transition Period published by APA, has been included. |
| V3.0    | 06/08/2026  | Included the update of Circular No. 01/2026/DFEMR on July 24, 2026                                  |
| V4.0    | 17/08/29026 | "Included the clarifications provided by APA S047932-202608-DFEMR.DFEMR on 13.08.2026"              |
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