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Real Price of Deposit

Analysis of the introduction of the deposit-refund system for single-use beverage packaging in the Slovak Republic

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Economic analysis 4

<u>Note (3rd December 2018)</u>: The document was updated with several clarifitations and was cleared of typos. Conclusions as well as all the calculations and results remain unchanged.

Note (25th September 2019): The document was updated with Annex 4 and Annex 5.

Note

This document presents the views of its authors and of the Institute for Environmental Policy which do not necessarily reflect the official views of the Ministry of Environment of the Slovak Republic. The analyses prepared by the Institute for Environmental Policy (IEP) are published to stimulate and enhance professional and general discussion on various environmental topics. Therefore, any quotations of this text should refer to the IEP (and not the Ministry of Environment of the Slovak Republic) as to the author of these views.

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Non-technical summary

Although PET and aluminium represent less than 2 % of weight of all municipal waste, the issue of the mandatory deposit-refund system for single-use packaging has been opened on a regular basis in Slovakia. As they are not biodegradable, they disturb the ecosystem in the long term, they can float on the water surface, and reduce the aesthetic value of territories, the public perceive them very sensitively. The objective of the study is to estimate the real price of deposit including the investment costs and annual costs of operation, operation of machines, employees, transport, etc.

According to IEP estimates, about one billion pieces of single-use PET beverage packaging and roughly 345 million beverage cans are placed on the Slovak market annually. About 62 % of PET bottles are collected through the separate collection.

The deposit-refund system is an instrument that can increase the quantity of collected PET bottles to more than 90 % and it also contributes to the reduction of the quantity of litter lying around in the nature. However, in comparison with the separate collection it is a relatively expensive system. Its introduction would also mean the weakening and rise in price of separate collection because the most lucrative raw materials would be excluded from it. At present, the mandatory deposit-refund system for PET and other beverage packaging is in operation in eight EU countries.

The study works with the model of deposit-refund system for single-use beverage PET packaging and cans, which is inspired by successful Scandinavian systems. If the producer fails to reach at least the prescribed 90% return rate or decides to not use deposits and to not participate in the system, they will have to pay a relatively high environmental tax for each packaging. All retailers will have to sell beverages with the deposit; however, not all of them will collect them. Take-back and deposit refund will be obligatory for retailers with sales area exceeding 400 m². We expect that smaller shops will also join the system due to the competitive advantage. The whole system will be financed by producers through the administrative fee per one bottle/can. The deposit-refund system also assumes the establishment of the so-called Central System created by associations of producers with the Ministry's supervision, which will coordinate activities, finance the system and act as a clearing centre for the stakeholders.

The introduction of the deposit-refund system in Slovakia would require investment costs amounting to about EUR 80 mil., of which the costs of purchase, installation and service of reverse vending machines will amount to EUR 61.8 mil.. The rest will cover the costs of system security, manual collection and costs of the establishment of the Central System, whose competences will include the counting, sorting and collecting of bottles from entire Slovakia.

The system should generate annual revenues of EUR 28 mil. and the operating costs should amount to about EUR 33.3 mil. The costs of the Central System should amount to almost EUR 20 mil., of which the biggest item is costs of transportation (EUR 14.2 mil.). Beverage packaging will have to be collected from shops, transported to interim storage facilities and from there, consolidated packaging will be transported to the counting centre and sorting plant. The retail costs will amount to EUR 13.6 mil. The Central System will compensate these costs to retailers through the so-called handling fees. On the side of revenues, EUR 15.3 mil. will flow from uncollected deposits, EUR 9 mil. from the sold PET material, and almost EUR 4 mil. from aluminium cans sold for recycling.

The total negative balance of EUR 5.1 mil. will be paid by producers through the administrative fees. Today, the producers pay approximately 0.4 cents for a PET bottle, in the mandatory deposit-refund system it will be 1.5 cents. As aluminium's value is several times higher than the value of PET, revenues from the secondary aluminium will be sufficient so that can producers will pay no administrative fee. Our estimates



are in compliance with the standard amounts of fees in the countries with the deposit-refund system in operation. The total producers' costs of packaging collection will rise from current annual costs amounting to EUR 3.6 mil. to EUR 13.2 mil. – including the settlement of the negative operating balance as well as investment costs depreciations.

The total operating costs of the system are sensitive in particular to the rate of return of PET and cans. The operation itself does not depend so much on the rate of collection automation or on the supplier of reverse vending machines; it rather depends on the rate of return of packaging. The more bottles are returned by the consumers, the lower revenues from non-refunded deposits remain in the system. The deficit must be settled by producers as a higher administrative fee. The price of operation also depends on the prices of PET and aluminium material. Higher prices for material mean higher revenues from the sale of material, thus reducing the total operating costs. The rate of automation has an essential influence on the amount of investment costs. With a higher number of bottles returned through reverse vending machines, the costs of machines naturally rise. The selection of machine supplier also affects the amount of investment costs. In the study, we worked with two offers with a difference of 6 %, where with the more expensive offer the rate of automation would drop by 2 percentage points and reverse vending machines would not be advantageous for any small shops. So we recommend that all machines are procured and paid by the Central System because it has a better negotiation ability and better knowledge of the market.

The introduction of the mandatory deposit-refund system will have only a minimum impact on the total rate of recycling of municipal waste. As PET and aluminium beverage packaging is light and creates only a negligible share in the total municipal waste, the rate of recycling of municipal waste would rise with a 90 % return rate of PET and cans by only 0.5 percentage points. We should rather see benefits in the volume of averted littering and landfill waste, all that only for PET bottles in the amount of 0.9 million cubic metres, which can be visualised as Námestie slobody (Freedom Square) in Bratislava filled with PET bottles to a height of 22 metres.

The mandatory deposit-refund system for PET bottles and cans will also have other indirect and social costs and benefits. The biggest benefits include the reduction of the quantity of litter lying around, a positive influence on employment, and environmental benefits resulting from a lower quantity of discharged emissions and energy and material savings. Moreover, it will lead to many other, only hardly identifiable indirect benefits, such as an increase in the aesthetic value of territories or a lower burden for ecosystems. On the other hand, by excluding PET bottles and cans from the separate collection the system of separate collection will lose valuable raw materials, which will increase the price of the system. As the consumers will have to store and bring bottles and cans back to shops, their comfort will be reduced.

The analysis examines the possibilities and costs of the introduction of the deposit-refund system for PET bottles and cans in Slovakia. The first chapter defines the problem, the second chapter presents advantages and disadvantages of the mandatory deposit-refund system, and the third chapter its application in Europe. The fourth chapter representing the core of the analysis presents how the mandatory deposit-refund system could be operated in Slovakia, and direct financial costs and benefits of the deposit-refund system are quantified for this example. The last part describes and, if possible, quantifies other indirect or socio-economic benefits and costs.

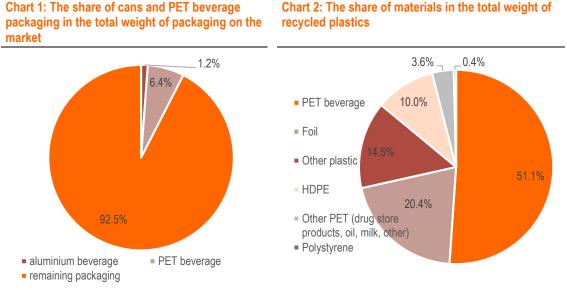
1 Accumulating waste from single-use beverage packaging

From the moment of production, almost any packaging is condemned to become waste. Customers purchase products because of the content. The packaging is only the means through which the goods are supplied to customers in intact condition. After the use of the product, packaging at best becomes part of municipal waste. Worse, they end up in public areas, in the forests or seas.

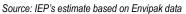
The surge of packaging waste has become a global problem. According to the Eurostat data, only in the EU almost 85 million tons of packaging waste are produced annually and the quantity continually grows. A large part can be recovered also thanks to incineration; however, thousands of tons still end on landfills or in the wild. From there, they get to rivers, which take them to seas and oceans. The Great Pacific garbage patch is estimated to be twice as large as France and it essentially affects life in the ocean (Milman, 2018).

Although pollution of seas is caused mostly by waste from Asia and Africa, the problem of littering, i.e. litter lying around is also present in our country (UN Environment, 2018). Recently, the public has noticed the case of the river Bodva, but the water reservoir Ružín is the best known example in the long term. Every year, hundreds of cubic metres of waste are extracted from it, which represents costs amounting to tens of thousands of euros (TASR, 2016).

Beverage packaging represents a great part of street pollution. They create almost 8 % of the total weight of all packages placed on the market. However, the packages themselves create only one fourth and beverage PET and aluminium less than 2 % of the total weight of all municipal waste including small construction waste. Their share in the weight of waste is not big, on the other hand, due to their size and physical properties they are much more visible than other packaging, and the public perceives them more sensitively. Their disadvantage is that despite low weight they have big volume and float on the surface. Moreover, they are not biodegradable and disturb the ecosystem and aesthetic value of territories in the long term.



Source: IEP's estimate based on Envipak data



Today, Slovakia is able to collect only about 60 per cent of single-use PET bottles. For cans, there is no similar statistics; and aluminium is even more lucrative material than PET. This share can be increased by increasing the efficiency of separate collection including the increase in the fees for landfilling, by introducing environmental taxes on packaging or by introducing deposit-refund systems. In particular because of their great number, easy recycling and secondary use, as well as a significant share in littering, PET bottles and cans are ideal candidates to increase the rate of recycling.



Box 1: How much beverages in PET bottles are drank annually?

It is not clear how many PET bottles are placed on the Slovak market annually. The foreign as well as Slovak research agencies and associations dealing with the problem (such as Nielsen, Canadea, SLICPEN or AVNM), estimate their number to be within the range of 530-830 millions pieces. According to the reports of producers within the system of extended responsibility, it is about 774 millions pieces. On the opposite side, conservationists such as Mikuláš Huba estimate 1.5 billions pieces (Huba, 2018).

According to the estimate of the IEP, more than 34 thousand tons of PET bottles are placed on the market in Slovakia annually, which means almost one billion pieces. According to these estimates, the reports of producers are underestimated by almost 30 % and the real rate of separation of PET bottles is about 62 %. Our estimate is based on the data on municipal waste for 2016 and waste analyses. Within the separate collection about 21.6 thousand tons of PET material are collected. Roughly 10 thousand tons are in mixed waste and additional 2.5 thousand tons are in the waste from street cleaning. Litter lying around in the nature and water courses in tens to hundreds tons of PET bottles is to be added. Thus, the total quantity of PET material reported should not be lower than 34 thousand tons, i.e. almost one billion pieces per year.

Education and raising awareness of responsible waste handling is the key to a high rate of separation. This is a long term process. If we want to reach a significant improvement in the rate of separation and recycling in the short or medium term, in addition to environmental education also other measures have to be taken.

The achievement of a 90 % rate of separation of plastic bottles proposed by the European Commission is possible in practice only by introducing the mandatory deposit-refund system for PET bottles (European Comission, 2018). With this system, when buying a beverage in the PET bottle or can, the customer pays a deposit in addition to the product price. The shop will pay the deposit back only after the beverage packaging is returned; subsequently it is recycled.

Box 2: Proposal for a Directive on the reduction of the impact of certain plastics on the environment

At the end of May 2018, the European Commission published the Proposal for a Directive of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment whose objective is to prevent the environmental impact (European Comission, 2018). the main proposed measures include:

- **ban on selected plastic products** such as cotton bud sticks, plastic kitchenware and plates, straws,
- consumption reduction targets for food containers and beverage cups,
- **the duties of producers** to cover a part of costs of waste management and environmental cleanup, as well as to raise awareness of harmfulness of food containers, packaging, beverage cups, tobacco products with filters, wet wipes, balloons or lightweight plastic carrier bags,
- collection targets including the target of 90 % collection for single-use plastic beverage packaging by 2025,
- **marking requirements** with the instructions how to dispose of waste from selected products, such as wet wipes, balloons or sanitary towels,
- **measures raising awareness** about the negative impact of littering as well as about the available re-use and waste management options for the plastic products.



2 Advantages and disadvantages of the deposit-refund system for beverage packaging

The academic literature comparing the total costs and benefits of the deposit-refund system is ambiguous and the results to a great extent depend on the particular conditions. According to Davies (2017), the total social benefits are three to six times higher than the costs of introduction of the deposit scheme, in particular thanks to lower littering. In the case of Israel, according to Lavee (2010), the total benefits should exceed the costs by 35 % and there should be considerable positive influences for municipalities due to lower costs.

On the contrary, authors in certain countries are sceptic. According to Deprez (2016), the costs of the depositrefund system in the Netherlands exceed the benefits by more than 10 %. Vigsø (2004) in Denmark estimated that total social costs of the deposit-refund system are higher than benefits even after taking into account the environmental benefits. If cans are excluded from the system and energy recovered along with the other municipal waste, social cost savings amounting to EUR 6.7 to 8.1 mil. annually would be achieved. According to Dewees and Hare (1998), the scheme is more expensive than separate collection even when taking into account other costs than waste collection or its disposal.

Despite the ambiguity of studies, the system is popular in many countries of the world. According to Dewees and Hare (1998) it is for example in Canada due to the costs hidden from the consumers who return the packaging. Another reason can be that the public feels that the deposit-refund system is justified with any costs because the beverages concerned do not fill essential needs.

The biggest advantage of the mandatory deposit-refund system for beverage packaging is its provable performance, when the rate of return often reaches more than 90 %, which no other waste collection scheme matches (Reloop - CM Consulting Inc., 2016). Less waste from selected raw materials ends up in landfills or lying around in the nature as the amount of the deposit gives consumers reason for returning the bottle (Dace, et al., 2013).

Unlike higher landfilling fees, the deposit-refund system does not motivate to illegal waste management and can be an optimum measure if the deposit amount equals to the marginal social cost of packaging disposal (Palmer & Walls, 1997). Indeed, the influence on littering reduction in certain countries was doubted, for example according to Deprez (2016), the deposit-refund system for single-use beverage packaging in Germany has not considerably reduced the quantity of litter thrown away on the streets, but the total impact is different in each country and depends on how common the littering is and on the share of beverage packaging in the littering.

Moreover, the introduction of the mandatory deposit-refund system considerably reduces the quantity of the litter lying around, thus, it reduces also the costs of cleaning (Eunomia, 2012; Hogg, et al., 2017). It also increases the revenues from the secondary raw material as the collected PET has a positive market value in contrast to many other waste. Additionally, the material collected is cleaner, which increases its market price. Hogg et al. (2011) also expect a positive influence of system introduction on employment.

The mandatory deposit-refund system is the only system which can exactly monitor, how many products were placed on the market, and how many were collected, thus minimising stowaways in the system. In the countries, where no deposit-refund system is in operation, the rate of recycling is only estimated with a deviation of 10 to 20 percentage points (Zero Waste Scotland, 2017). Moreover, the system penalises the polluter – the citizen, if they fail to return the bottle, and the producer that places the products on the market by funding the system and ensuring its function (Eunomia, 2010).



According to Kuczenski – Geyer (2009), who monitored the environmental impacts of PET recycling on the example of the mandatory deposit-refund system in California, in comparison to primary PET, recycling can reduce the use of primary energy by 54 % and emissions of greenhouse gases by 23 %. The total impact on CO_2 emissions is usually evaluated as positive but according to certain authors it is relatively low in comparison with the necessary costs of the scheme (Deprez, 2016). It is because the scheme requires additional costs of transport which causes additional emissions of CO_2 .

The main disadvantage of the deposit-refund system is the expensiveness of the system as the revenues from uncollected deposits and raw material sold are not sufficient to cover the costs of its operation (Europen, 2009). This is another reason why in the EU, the system has been implemented only by eight countries. It is necessary to consider whether increased expenses would not bring a bigger effect with the strengthening of the current system. In addition to significant investment costs of mainly reverse vending machines and sorting line, the system also requires non-negligible annual operating costs. The system of packaging marking preventing from the collection of deposits for bottles from abroad will also represent additional costs.

Some critics point out that the deposit-refund system undermines the system of separate collection already in operation as it disturbs the habits of citizens to throw plastics into yellow vessels (Europen, 2009). At the same time, by excluding aluminium and PET, the system of separate collection will lose a considerable source of revenues because they are among the most valuable materials. It will overprice separate collection for the other producers, which can mean pressure on price increase.

In addition to the financial costs, it will also bring indirect costs in the limitation of free beverage market between Slovakia and other countries of the EU as the Slovak bottles will have to bear specific labelling (Europen, 2009). Last but not least, the deposit-refund system brings along the reduced comfort of consumers who will have to go to the closest shop repurchasing bottles; it will not be enough to throw the bottle into a container near their house (Deprez, 2016).

The mandatory deposit-refund system does not solve waste management as a whole; it focuses only on one part of waste from packaging (Eunomia, 2010). The deposit-refund system for PET or aluminium beverage packaging will not increase in any way the use of recyclable alternatives and the producers using hardly recyclable packaging materials will remain untouched by the measure.

Box 3: Research for the real rate of separation and recycling

Today, it is relatively difficult to specify the exact rates of sorting and recycling for individual waste components. According to the reports sent by producers to the producer responsibility organisations (PRO), the rate of separation of plastic packaging and non-packaging in the municipal waste in Slovakia in 2016 was only 26 % and the rate of recycling 53 %. According to the estimates of IEP from data on municipal waste it is only 22 % for both indicators. Neither this may be the real rate of separation or recycling of plastic packaging.

The official rate of recycling of packaging and non-packaging is based on the reports of producers to PRO and is distorted by the following facts:

- the reports may be underestimated by as much as 30 % (more in Box 1),
- recycled packaging and non-packaging do not come only from municipal waste but also from industrial waste. If the quantity of materials collected from municipal waste is not sufficient to reach the targets of waste recycling and recovery, PRO can supplement the uncollected quantities from municipal waste with industrial waste from packaging in order to achieve the prescribed target,



 on the contrary, the total quantity of packaging placed on the market is not increased by the industrial packaging. PRO can increase the data on recycled packaging by industrial packaging but this does not apply to the data on the total quantity of packaging placed on the market.

Therefore, a more accurate estimate is provided by the analysis of municipal waste. The analysis is based on the official figures concerning the waste sorted as well as on the estimated share of the materials in the mixed municipal waste. According to this methodology, we separate and recycle about 22 % of plastics from municipal waste. However, the data serve to monitor only the selected materials, we cannot assess the general rate of separation in Slovakia because the municipal waste also contains the waste that does not belong to sorted components and it is not included in the mixed waste (voluminous waste, small construction waste, waste from street cleaning etc.). More accurate estimates of rates of separation could be obtained based on regular analyses of municipal waste and strict control of producers' reports.



3 Mandatory deposit-refund systems in Europe

Mandatory deposit-refund systems for beverage packaging are currently in operation in eight countries of the EU (Sweden, Denmark, Finland, Estonia, Germany, Netherlands, Lithuania, and Croatia) and in two other countries of the EEA (Norway and Iceland). Scotland also plans to introduce the deposit-refund system for beverage packaging and several countries have worked out an analysis of possible introduction of this system. Moreover, the system is in operation in ten States of the USA, in Canada, Israel and partly in Australia and some islands in the Pacific Ocean.

The first states to introduce the deposit-refund system were Iceland and Sweden at the turn of the 1980s and 1990s, Lithuania was the last one in 2014. All the systems in Europe have the deposit-refund system for PET bottles and also cans; the amount of deposit ranges from about 7 cents in Croatia to 40 cents in Finland¹.

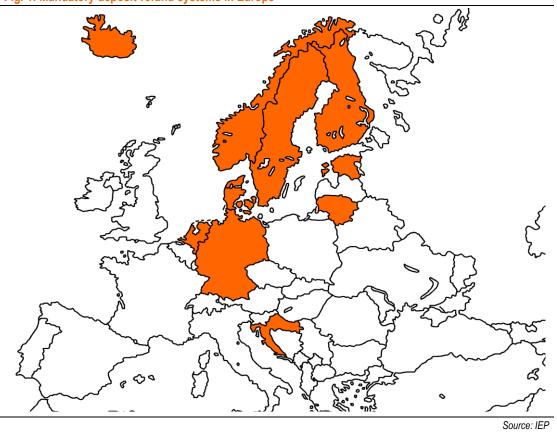


Fig. 1: Mandatory deposit-refund systems in Europe

The systems in operation in individual countries often differ from each other to a great extent, either as regards materials, which they include, or because the scheme involves reusable packaging. Their common objective is to capture almost all PET bottles placed on the market. Almost all systems can collect over 85 % of all PET placed on the market.

For hygienic reasons, most countries exclude packaging with milk and fruit juices from the deposit-refund system. Due to large differentiation, alcohol also is often excluded from the system, except for beer. Finland represents an exception; any alcohol packaging is subject to the deposit-refund system. The system usually does not include very small (less than 0.1 litres) and very big (over 3 litres) beverage packaging. Small



¹ The summary of the systems is provided in the comparing table in Annex 2.

producers are also granted exceptions. Environmental tax is an alternative of how to burden the packaging that can be included in the deposit-refund system only with difficulties.

Not all the systems are directly mandatory for producers. The environmental tax is an instrument indirectly motivating the producers to include their packaging into the deposit-refund system. For example, in Finland the producers are obliged to pay the environmental tax in the amount of EUR 0.51/litre unless they are involved in the system. In Norway, ecological tax also exists but it is focused on achieving a 95 % rate of return. In the other countries, the participation in the system represents a statutory duty.

There is no system operating without the participation of retail. The retail is not a polluter (like the producer placing the packaging on the market and the citizen who does not return the packaging), therefore, individual schemes pay to the retail a handling fee covering the costs connected with collection. Collection takes place in particular through reverse vending machines, whose purchase is not always reimbursed. In Norway, it is included in the handling fee, in Sweden one machine per shop is reimbursed, in Finland there is no way of compensation. In Lithuania, the central system leases the machines.

All the systems are characterised by the existence of the so-called "central system". It is an organisation coordinating the activities of individual actors. Its powers differ depending on the country, for example, in the Scandinavian countries it is also the accounting unit, in Germany it does not balance the deposits and has no records of actually returned bottles. The central system is created by producers, often also the retail, the local Ministry of Environment usually acts in audit bodies.

Box 4: Current deposit-refund system in Slovakia

The deposit-refund system for reusable beverage packaging is in operation in Slovakia today. It is voluntary for producers and mandatory for sellers. Thus, the producer can decide whether the product will be included in the deposit-refund system, on the contrary, if the seller sells the bottle, they must also collect it. The common costs of collection as well as the costs of machine purchase are thus fully borne by retailers. On the contrary, the producer is involved in collection only if it is economically advantageous for them. The deposit-refund system concerns more or less only beer bottles and breweries bear only single costs of recording bottle or crate identification in machines. The costs amount to tens of thousands of Euros. The rate of return of beer bottles subject to deposits is estimated to be about 98-99 %. In the past, reusable plastic bottles were sold in Slovakia. Today, however, no reusable plastic bottles are on the market in Slovakia and they also retreat from the markets in the countries with the mandatory deposit-refund system.



4 Financial costs of the deposit-refund system for single-use PET bottles and cans in Slovakia

Separate collection has come into existence only recently, and in many countries it was preceded by the deposit-refund system. The deposit-refund system in Slovakia included only reusable (mostly) glass packaging, whereas Sweden and Iceland were the first countries to introduce the mandatory deposit-refund system for single-used beverage packaging at the turn of the 1980s and 1990s.

The question of introducing the deposit-refund system for PET bottles in Slovakia is opened in regular intervals. It is caused by the increasing population's sensitivity to litter lying around, where PET bottles dominate, as well as by the habits of the society concerning the deposit-refund system for glass beverage packaging. The recently notified intention of the EU to increase the return rate of plastic beverage packaging to 90 % again activated the voices for the introduction of the mandatory deposit-refund system.

A well operating system is able to achieve a relatively hight rate of return. However, the costs necessary for such system are questionable, and this one of main arguments of the deposit-refund system opponents. The only complex Slovak study of this area so far was worked out in 2005. It compared the separate collection and deposit-refund system and came to a conclusion that although separate collection achieves a lower environmental efficiency, in every time period it is exceeded by the advantage of its higher economic efficiency, i.e. lower costs (M.E.S.A.10, 2005).

The objective of this chapter is to show, on a theoretical model of mandatory deposit-refund system in Slovakia, the possibilities of its operation and to quantify approximate costs and revenues.

4.1 Basic rules of the system

The basic inspiration for the pricing of the deposit-refund system was the Scandinavian model known as highly effective; most successful deposit-refund systems in Europe are based on it. On the contrary, the German model is considered to be one of the most expensive models, and it cannot exactly prove the rate of return because it includes only a limited flow of data. To estimate the costs, we simulated the following system:

- PET bottles and cans will be included in the deposit-refund system. Essentially each system includes cans, they are able to share the same infrastructure with plastic bottles without greater limitations. Thanks to the high price of aluminium they can often fund themselves, for example, in Norway the revenues from the sold raw material and uncollected deposits are enough to fund the entire system. Plastic bottles with milk, oil and fruit juices are excluded from the system. Thus, our model takes into account roughly one billion single-use PET bottles and 345 million beverage cans placed on the Slovak market annually.
- If a producer decides to not join the deposit-refund system, they shall pay an environmental tax of 24 cents for a beverage packaging. Several countries use environmental taxes that must be paid by producers if they do not participate in the deposit-refund system and/or if they do not fulfil the prescribed target. In our system, we expect the voluntary participation of producers in the system, and at the same time, the environmental tax amounting to 24 cents/beverage packaging, if the producer decides to not join the deposit-refund system. At the same time, producers must achieve the target of at least 90 % return rate of packaging. If they fail to observe it, the producers will have to pay the environmental tax for each bottle under the target quantity.



- The whole system will be coordinated by the so-called Central System (CS). It coordinates activities, finances the system and acts as a clearing centre for the stakeholders. It is one organisation created by producers, ideally by several associations that associate them in order to prevent preferential treatment of larger producers or producers that will join the system later. For example, in Estonia the central system is owned by the associations representing retail 25 %, importers 25 %, soft drink producers 25 %, and breweries 25 %. The CS will be supervised by the Ministry of Environment of the Slovak Republic, with which the CS will be obliged to share data.
- The amount of deposit will be determined by the Central System. Regardless of whether the bottle will be purchased in a shop collecting or not collecting bottles, the customer will pay deposit for each purchased bottle in the system thus, deposits for bottles will be paid to all shops but not all shops will collect. In theory, producers may determine the deposit amount themselves so that they reach the prescribed target as efficiently as possible. In our model, we take into account the unified amount of deposit for a PET bottle of 12 cents and for a can of 10 cents (more about the determination of the deposit in Annex 1). As a great part of littering consists of bottles smaller than one litre, we recommend not burdening them by a lower deposit. OECD also recommends that deposit amounts are not differentiated (OECD, 2015).
- The mandatory deposit-refund system for bottles will take place in retail shops with the sales space exceeding 400 m². The other shops² will be able to join the system voluntarily. We assume that a considerable part of shops with the sales space smaller than 400 m² will also join the system. They will be motivated by a competitive advantage (customers will prefer shops where they will be able to return the bottles) and by full reimbursement of costs connected with collection in the form of handling fee.
- Most bottles and cans will be collected by reverse vending machines, in small shops also manually. The reverse vending machine can identify bottles in several ways and in theory, the machine can receive them by reading the label, shape or hardened surface of the bottle. However, the system needs security in order to prevent speculations with the import of foreign bottles with the objective to collect deposits. Therefore it is necessary to equip the bottles with a unique EAN code specific for the bottles placed in the territory of the Slovak Republic. This will bring additional costs of security.
- The Central System will be in charge of the procurement of the infrastructure necessary for collection. It has a much better negotiating ability as well as better knowledge of market operation as a whole. It can use machines within shops as well as other ways of collection (e.g. a solution out of the shop), it can combine several suppliers or use long-term lease like in Lithuania. Last but not least, the retail is not a polluter so there is no philosophical reason for bearing such load by it.
- The system will be financed by producers through the administrative fee per one bottle/can. The total amount paid by the producer will depend on the quantity of bottles placed on the market. Moreover, the producers usually pay to the Central System the so-called membership (once, when joining the system) and registration fee (for the control and approval of each new beverage packaging; in the Scandinavian countries this means about 200-250 EUR/new product). Thus, the producers of PET bottles and cans will fulfil their duties resulting from the extended responsibility of producers, in the mandatory deposit-refund system. They will not have to pay the fees for the bottles to the PRO like they have been doing so far, they will pay the fees within the Central System of the mandatory deposit-refund system.

² In theory, also fuel filling stations and HORECA (hotels, restaurants, and catering) can join if they are interested in it.



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- The system does not allow for the provision of advantage to reusable bottles. The inclusion of reusable packaging would overprice the system with a disputable influence on the preferences of producers and manufacturers. The additional costs of the measure would not only probably eliminate the positive impacts of reusable packaging but also the effect of increased usage of such packaging would be disputable (Fitzsimons, et al., 2005). Everywhere in Europe and in the countries with the traditional support of reusable beverage packaging the trend of their retreat prevails (Reloop, 2016).
- The current deposit-refund system of reusable glass bottles will remain unchanged as it has its own infrastructure and corresponding results. Of course, in the future the question remains, what should be done with the other beverage packaging, either in glass or other materials (e.g. Tetra Pak, HDPE). There are schemes abroad with a much wider portfolio of beverage packaging; Finland even included in the deposit-refund system also glass bottles with wine or spirits.

4.2 The story of the bottle

To better understand how the deposit-refund system operates, it is suitable to describe the physical flow of bottles (or cans) and deposits in the system, as well as the flows of costs, revenues and information.

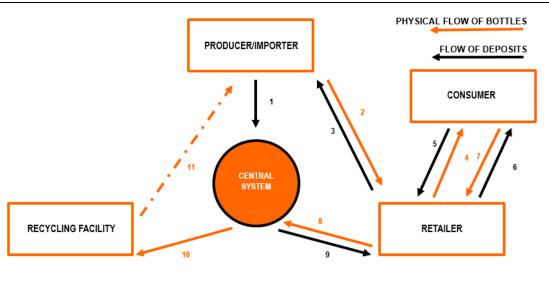


Fig. 2: Diagram of physical flow of bottles and flow of deposits

Source: IEP

The producer or the importer places on the market the beverage bottle and registers it in the central system, where they pay a deposit for it (1A). They sell the bottle and send it to the retailer (2A), who pays the deposit for it (3A). At that moment all the deposits paid to the central system are returned to the producer.

The retailer sells the bottle to the consumer (4A), who pays the deposit for it, which returns to the retailer the deposits that were paid previously to the producer (5A). The consumer consumes the beverage and has a dilemma whether they should return the bottle or dispose it in other way. The amount of the deposit motivates them to return the bottle and get back the paid deposit.

The bottle returns back to the retailer whose figures are negative because they had to pay the deposit (6A) and take over the empty bottle (7A). However, the retailer sends the bottle to the central system (8A), which will pay to the retailer the deposits paid to the consumer (9A). At that moment all the deposits paid to the consumer are returned to the retailer. The central system sells the empty bottles to the recycling facility (10A). In practice, however, the bottle can go directly from the retailer to the recycling facility and the central system will only account it. The recycling facility will process the bottles and a part of the material will get back to the producer in the form of a new bottle (11A).



This will be directly reflected in the scheme of the flow of revenues and costs. At that moment, the central system has revenues: from the uncollected deposits (1B) and from the material sold to the recycling facility (2B). It has also costs: of the transport of bottles (3B), the handling fees to the retailer covering the costs resulting from the participation in the system (4B), of the counting centre and sorting plant, which interconnects manual collection and collection in reverse vending machines (5B), and other common expenses (6B). The difference between the system revenues and costs is negative. The difference is settled by the producers through the so-called administrative fee (7B).

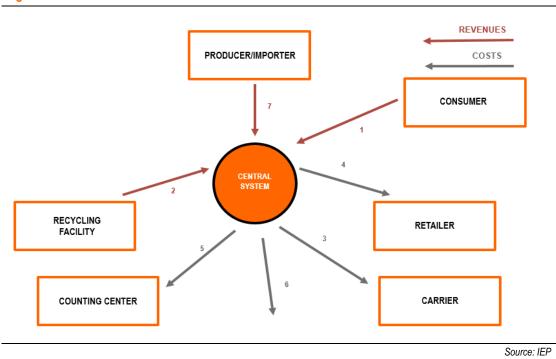
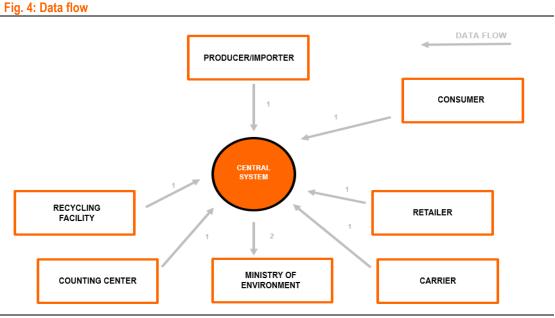


Fig. 3: Flow of revenues and costs

Data flow also takes place between individual actors and the central system. All the entities send data to the central system (1C), which shares them subsequently with the Ministry of Environment (2C).



Source: IEP



4.3 Calculation of direct financial costs and revenues

The direct financial costs and revenues are estimated based on the zero scenario prepared on the basis of foreign literature and on practice and domestic data. The key parameters are provided in Table 1. Further assumptions are analysed in the calculation of individual costs. The complete methodology is provided in the technical annex.

| Parameter | Value | Source |
|---------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| Rate of return | 90 % | Arbitrarily set based on the rate of the systems already introduced |
| Deposit amount | 12 cents for PET bottles and 10 cents for aluminium cans | Logarithmic function based on the reloop data, see more in Annex 1 |
| Rate of involvement of small organised shops (with the sales space less than 200 m ²) | 100 % | IEP based on the data on saleability |
| Rate of involvement of unorganised shops | 50 % | IEP based on the date on saleability |
| Number of shops with a reverse vending machine | 2,017 (hypermarkets, supermarkets, discount shops and large organised shops will be fully automated, 26 % of small organised shops and 0 % of unorganised shops will have a reverse vending machine) | IEP based on the data on saleability and capacity of reverse vending machines |
| Environmental tax | 24 cents per bottle but it also expects that the producers will not pay it because they will fulfil their objective of 90 % collection | Arbitrarily set to double the deposit |
| Average weight of beverage packaging | PET 35 grams and can 16 grams | The average value of several sources (Eunomia, Recoop, LIMO Špec, IEEP, and Dace, et al., 2013) |
| The quantity of beverage packaging placed on the market annually | 989 mil. PET bottles and 345 mil. beverage cans ³ | IEP based on the data on waste, see more in Box 1 |
| Market shares of shops | 36 % hypermarkets, 24 % supermarkets, 25 % discount shops and large organised shops, and 15 % small and unorganised shops. | IEP on the basis of INCOMA Research and GfK estimates |

Table 1: Zero scenario input parameters

Source: IEP

We estimate that the introduction of such system will require single investment costs amounting to EUR 80.2 mil. and the operating balance of the system will be EUR -5.2 mil. per year. Both the investment cost and the negative balance of revenues and costs will be financed by the producers placing beverage packaging on the market through administrative fees. They have paid about EUR 3.6 mil. per year to the producer responsibility organisations so far, whereas to the central system they will pay annually about EUR 13.2 mil. – including the reimbursement of the negative operating balance as well as depreciations of investment costs.

At the same time, the total rate of recycling of municipal waste⁴ in Slovakia will increase by 0.5 percentage points, from 23 % to 23.5 %. The rate of recycling of plastic packaging in 2016 reached 48 % based on the data of PRO reports and on the ground of an underestimated quantity of PET beverage packaging placed



³ We expected that the deposit-refund system would have a negligible or no influence on the quantity of bottles sold. Although the deposit is an extra cost for people, 90 % of consumers will decide to take over the deposit so it should not affect the total demand.

⁴ Without small construction waste.

on the market. In comparison with this number, the rate of recycling of all plastic packages would increase by 7 percentage points to 55 %. The rate of recycling of all packages would increase from 64.6 % to 66.5 %, i.e. approximately by 2 percentage points. On the other hand, only for PET bottles, the volume of littering and landfilling saved will amount to 0.9 million cubic metres – i.e. Freedom Square in Bratislava filled with PET bottles to a height of about 22 metres.

Table 2: Mandatory deposit-refund system balance

| Fee | Value (EUR) |
|-------------------------------------------------------------------------|-------------|
| Investment costs | 80,181,011 |
| Operating costs | 33,324,913 |
| Revenues | 28,272,415 |
| Total balance (the difference between the operating costs and revenues) | -5,052,498 |
| | 0 |

Source: IEP

The system will specify the administrative fee according to the real costs. Based on price estimates we expect that the administrative fee will amount to 1.5 euro cents per one PET bottle placed on the market. The revenues from the sale of aluminium should be sufficient to cover all the related costs therefore can producers will not have to pay administrative fees⁵. However, this depends on the actual market prices of both commodities.

The costs also include the settlement of costs incurred by retail due to the participation in the system. The retail would receive compensation through the so-called handling fee in EUR per a returned beverage packaging. Like for the administrative fee, the central system will calculate it according to real costs, however we estimate that for retailers with reverse vending machines it will be 0.9 euro cents per packaging and for a retailer with manual collection 3.1 euro cents per packaging. The fee for manual collection is higher because the investment costs of collection from reverse vending machines will be settled by the central system. This cost as well as the other investment costs are included in the administrative fee as depreciations.

Table 3: Fees within the scheme (per one beverage packaging placed or returned)

| Fee | Value (EUR) |
|------------------------------------------------------------|---------------------|
| Administrative fee per PET bottle | 0.015 |
| Administrative fee per can | -0.005 ⁶ |
| Handling fee for a retailer with a reverse vending machine | 0.009 |
| Handling fee for a retailer with manual collection | 0.031 |
| | Source: IEP |

Although the amounts of fees (in particular the handling ones), in particular due to the different approach to the reimbursement of costs of purchase of reverse vending machines, are not fully comparable with the fees abroad, we can state that our estimate is in compliance with the standard amounts of fees in the countries where the deposit-refund system is in operation.

Table 4: Comparison of administrative fees in selected countries (in euro cents)

| | SVK_IEP | Norway | Sweden | Finland | Denmark |
|----------------|---------|------------|------------|-------------|------------|
| aluminium cans | -0.5 | 0 to 0.3 | 0 | 0.5 | 1.2 to 5.5 |
| PET bottles | 1.5 | 1.9 to 3.4 | 2.1 to 5.5 | 1.7 to 11.5 | 2.8 to 3.6 |

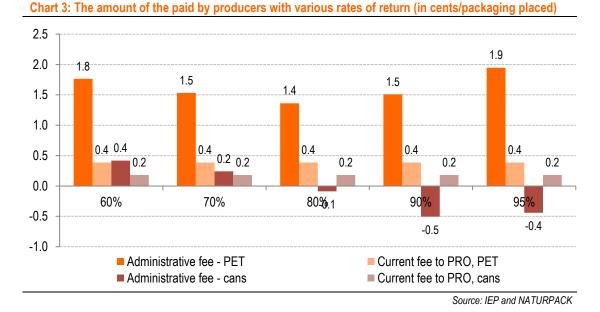
Source: IEP, reloop

⁶ In practice, this fee will be most probably equal to zero because it is slightly negative also in other countries (e.g. in Norway) but the central system nowhere pays the excess money back to producers.



⁵ It must be noted that the system along with PET bottles generates high savings from which also cans draw. If only cans were included in the depositrefund system, their producers would have to pay an administrative fee amounting to approximately 3.1 cents/can.

The introduction of the mandatory deposit-refund system will essentially increase the costs of the producers placing PET beverage packaging on the market. Today, they pay about 0.4 cents per bottle, in the mandatory deposit-refund system it will be 1.4 to 1.9 cents depending on the rate of return, and with the aimed rate of 90 % it will be 1.5 cents, i.e. about four times more.



The operation of the system itself does not depend as much on the supplier of the reverse vending machines, as it depends on the rate of return of bottles and on the rate of automation. The rate of automation, i.e. the number of packages returned through the reverse vending machine out of the total number of returned packages, depends on the form of collection selected by the shop. A lower rate of automation means higher costs of manual collection which is inefficient in certain cases. The lower limit of the rate of automation represents the case when small organised shops will collect only manually, on the contrary, the upper limit means fully automated collection in small organised shops. As regards the dependence on the rate of return, the more bottles are returned by consumers, the lower revenues go to the system from the unreturned deposits. As the deposit amount is several times higher than the price of the raw material of which the bottle is produced, a bigger quantity of PET material cannot cover a lower revenue from uncollected deposits. The negative operating balance of the system is also affected by the price of the secondary material. Based on the development of stock exchange prices, we tested the influence of an 8% deviation of the aluminium price and 10 % of the PET price, and the balance is more sensitive to the change of the price of secondary PET.



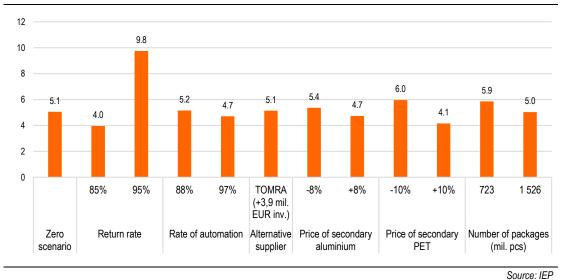
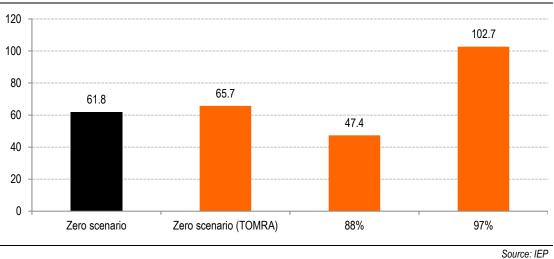


Chart 4: Negative operating balance of the system depending on individual indicators (in mil. EUR)

In addition to the rate of return, the rate of automation has an essential influence on the amount of investment costs. The smaller is the shop, the less efficient is the operation of a reverse vending machine. If too many shops are automated, the low efficiency will manifest itself in high investment costs.





4.3.1 Investment costs

We estimate that the introduction of the mandatory deposit-refund system for beverage PET and metal packaging will require single investment costs amounting to approximately EUR 80.2 mil. All the investment costs are subsequently reflected in the fees paid by producers, which means that after ten years the producers will have settled through the administrative and registration fees the whole investment costs as well as operating costs of the system for that period.

Table 5: Investment costs of the mandatory deposit-refund system Item

Value (EUR)



| Purchase, installation and service of reverse vending machines | 61,838,831 |
|----------------------------------------------------------------|------------|
| Additional costs of manual collection space modification | 334,813 |
| Establishment of a central and counting centre | 14,585,803 |
| out of it establishment of a counting centre and sorting plant | 3,893,416 |
| out of it establishment of the central system | 10,692,388 |
| Security (deposit logo, EAN code) | 3,421,564 |
| TOTAL | 80,181,011 |

Source: IEP

The biggest item will be the **purchase of reverse vending machines** (RVM). According to the price quotation of Norwegian RVM Systems, the investment costs for 10 years amount to EUR 61.8 mil. The price includes purchase, installation, and service of the machines. According to a competitive price quotation from TOMRA, investment costs for the purchase of machines would amount to EUR 65.7 mil., and the rate of automation would drop by two percentage points, and the reverse vending machines would not be economical for any small shops. Higher prices and lower automation can be assigned in particular to the non-conforming capacity of their machines for smaller shops as they offer higher than needed capacity.

It depends on the decision of the Central System, from whom it will purchase the reverse vending machines or whether it will not prefer lease over the direct purchase of machines. In reality, the Central System may also select several suppliers or involve large-capacity "cash&go" machines from Anker Andersen in the system. However, it is not a standard solution therefore in the zero scenario we preferred the offer from RVM Systems. Moreover, we contacted other producers, such as: Wincor Nixdorf, Envipco Holding N.V., Toperczer, Eltronic, and Trautwein. However, we received no price quotations from them.

Reverse vending machines are in Slovakia currently supplied mostly by Tomra. There are about 800 reverse Tomra vending machines on the market today, of which 12 % can be modified so that they would be able to receive both the PET bottles and the cans. Although modification of a reverse vending machine is cheaper than the purchase of a new one, the shop will lose the capacity for receiving glass bottles. Therefore we selected the variant that the whole capacity for receiving PET and metal beverage packaging will come from newly purchased reverse vending machines.

Our model assumes that 100 % of organised shops with the sales space smaller than 200 m² will join the scheme voluntarily. For unorganised small shops, we considered a 50 % rate of involvement in the system. The shops without reverse vending machines will collect the beverage packaging manually. The optimum form of purchase in the shop is specified on the basis of the annual sale of packaging per one shop and the recommended volume of sale, from which the reverse vending machine is economical. In case of manual collection, additional costs are necessary to modify the space; their pricing is taken over from the Spanish study worked out by Eunomia (Eunomia, 2012).

The investment costs for the establishment of the **counting centre and sorting plant** are estimated in the amount of EUR 3.9 mil. For economic reasons, the reverse vending machines will collect bottles and cans into one vessel. The beverage packaging from entire Slovakia will be separated, consolidated and compacted in the accounting centre, where the bottles from manual collection will also be counted up. To perform such acts, additional technology will be necessary, such as optical line, counting and sorting machine and magnetic separator. The costs of sorting line were estimated on the basis of data from the Norwegian central system of the deposit-refund system Infinitum.

Central System establishment will require the costs amounting to EUR 10.7 mil. They consist of system planning and design, its implementation, conclusion of contracts, communication, costs of rooms, equipment and the information system that will gather and process all data. The costs were estimated according to the study of Eunomia for the deposit-refund system for single-use beverage packaging in Scotland. **System security** includes the deposit logo and EAN codes. The costs of security were also taken over from the Scottish study and they are about EUR 3.4 mil.



4.3.2 **Operating costs**

The total annual operating costs of the system are estimated in the amount of EUR 33.3 mil. Out of that, EUR 13.5 mil. will be the costs of retail and EUR 19.8 mil. the costs of the central system with the biggest item being transportation.

| Item | Value (EUR) |
|-------------------------------------------------------------|-------------|
| Retail costs | 13,564,279 |
| Costs connected with reverse vending machines | 9,933,544 |
| Space in the shop and store including the opportunity costs | 3,091,622 |
| Bags | 4,944,499 |
| Reverse vending machine operation (energy) | 180,933 |
| Labour costs | 1,716,490 |
| Costs connected with manual collection | 3,630,735 |
| Store space | 609,059 |
| Labour costs | 2,833,668 |
| Logistics equipment (bags, labels and seals) | 188,008 |
| Central system costs | 19,760,634 |
| Transportation | 14,171,668 |
| Administrative costs (employees, rooms, IT) | 1,639,875 |
| Counting centre and sorting plant costs | 3,949,091 |
| TOTAL | 33,324, 913 |
| | Source: IEP |

Source: IEP

The costs will be fully reimbursed to retailers in the form of a handling fee for each bottle collected by the retailer. The handling fee represents the share of retail costs for the quantity of collected bottles. They differ depending on whether the retailer collects bottles manually or through the reverse vending machine.

The total costs of the retailers collecting bottles through reverse vending machines represent EUR 9.9 mil. The retailer involved in collection through the reverse vending machine has labour costs concerning the employees who empty and clean the reverse vending machine, the costs of equipment for logistics, as well as the costs of space in the shop and store, which also includes the opportunity costs because a part of the space, which could have been used commercially, must be used for the collection of empty beverage packaging.

The costs of manual collection will amount to EUR 3.6 mil. They include the costs of store space, labour costs and equipment for logistics. The equipment for logistics includes the costs of plastic bags, labels, and security seals necessary for the collection, transportation and identification of bottles, and correct payment of handling fees and deposits, which is based on the estimates of Tomra and RVM Systems, the Spanish study of Eunomia and the Institute for Economic and Ecological Policy (IEEP) (Jilková, et al., 2008). The price of equipment for logistics was provided by the Danish company Trioplast, which also provides such equipment in Norway.

The operating costs of the central system are estimated to be EUR 19.8 mil. and they consist of the costs of transportation, administrative costs of CS, and costs of the counting centre and sorting plant.

More than one half of the costs of central system is created by the transportation costs. For their estimate we expect one counting centre and sorting plant somewhere in the center of the country (we chose Žilina) and 34 interim storage facilities around Slovakia. The carrier will collect empty packaging from individual shops and transport them to the interim storage facility where they will be consolidated in transport



containers. The frequency of removal of empty packaging was determined according to the practice of the Norwegian system Infinitum. The carrier will arrive to pick up empty packaging from the shop, if their quantity corresponds to the size of 6.5 euro pallets. We also assume that the carrier will remove packaging from several shops during one drive in order to fill the vehicle to a maximum extent. From the interim storage facility they will be transported to counting centre and sorting plant on a regular basis, where the packaging from manual collection will be counted, sorted and subsequently compacted together with beverage packaging from the reverse vending machines. Then, the packaging will be EXW handed over to the recycling facility, which means that the facility will provide their own transportation.

The determination of transportation costs requires the road distance for the transportation of packaging from shops to interim storage facilities, from the interim storage facilities to the sorting centre and the price of transportation. As we do not have any map of shops and do not know the distance among them, the road distance between the shops and interim storage facilities was estimated by means of the methodology used in the Czech study of IEEP (Jílková, et al., 2008). The methodology is described in detail in the technical annex. The price quotations for transport are from the forwarding companies BM Transport and Lörincz.

The location and the number of interim storage facilities was determined on the basis of the minimum quantity of packaging that will have to be temporarily stored each year according to the experience of the Norwegian central system Infinitum, the number of inhabitants in individual districts and their geographic proximity. We do not take into account investment costs of their construction because we expect that the already existing stores will be used.

In practice, backhauling is often applied to the transportation of empty packaging from shops to interim storage facilities, which means that the truck supplying new goods to the shop uses the emptied space and fills it with empty returned packaging and transports them back to the interim storage facility. Thus, the costs of this part of transportation would consist only from additional fuel costs in comparison with the transportation of an empty truck.

The administrative costs of the central system consist of the administration of IT infrastructure, wage costs and costs of the services necessary for operation. The estimate is from the Scottish study of Eunomia, which is based on the data of the Finnish central system Palpa, with which we also communicated. The Scottish, Finnish and Slovak markets are relatively similar (Hogg, et al., 2015).

The counting centre and sorting plant will have operational labour costs, energy costs and costs of storage rooms. We estimated the investment and operational costs of the centre on the basis of communication with the Norwegian system Infinitum.

4.3.3 Revenues of the system

The total annual revenues of the mandatory deposit-refund system for beverage PET and metal (in Slovak conditions aluminium) packaging will be around EUR 28.3 mil. and they consist of the revenues from uncollected deposits and from the sold raw material provided that consumers will return 90 % of PET bottles and beverage cans.





| Revenues from unclaimed deposits for PET bottles | 11,975,194 |
|---------------------------------------------------------|------------|
| Revenues from the sold PET raw material | 9,046,194 |
| Revenues from unclaimed deposits for cans | 3,281,667 |
| Revenues from the sold raw material of (aluminium) cans | 3,969,360 |
| TOTAL | 28,272,415 |

Source: IEP

The price used for PET material comes from the recycling facility General Plastic. As the bottles from such collection will be probably cleaner, thus partial costs of cleaning will not be included, based on the communication with the company we expect the price of PET higher by about 10 %. One ton of aluminium was priced based on the recommended price of secondary aluminium from cans according to TOMRA EXW.



5 Indirect and social costs and benefits

The reduction of littering, increase in employment and environmental benefits on the one hand, reduced funding of separate collection and a decrease in the comfort of the population on the other hand – the introduction of the mandatory deposit-refund system for PET bottles and cans will not only affect the producers and the system itself but it will also bring other indirect and social costs and benefits. It must be noted that individual figures cannot be summed up as not all estimates are equally robust.

5.1 Additional benefits of the system

The introduction of the deposit-refund system will have a positive impact on the reduction of littering because the deposit amount will motivate people to return bottles to the shop. At the same time, the introduction of the system should bring the creation of approximately 250-360 jobs and environmental benefits due to increased recycling resulting in lower consumption of materials and energies and lower emissions of CO_2 .

| Table 8: Indirect revenues | of the mandator | v doposit refund system |
|----------------------------|-----------------|---------------------------|
| Table 0. Inullect revenues | of the manualor | y deposit-relation system |

| Item | Lower limit (EUR) | Upper limit (EUR) |
|-------------------------------------------------------------------------------|-------------------|-------------------|
| The saved costs of littering removal and landfilling of mixed municipal waste | 682,634 | 3,399,741 |
| Costs of littering cleaning | 628,895 | 2,710,086 |
| national parks and protected landscape areas | 0 | 51,385 |
| roads | 44,250 | 147,750 |
| streets | 556,674 | 2,440,574 |
| rivers | 27,971 | 70,377 |
| Costs of landfilling of mixed municipal waste | 53,739 | 689,655 |
| Benefit of increased employment | 3,350,500 | 4,824,720 |
| Environmental benefits of increased recycling | 3,035,587 | 11,618,986 |
| Saved energy and material | 1,216,432 | 10,531,949 |
| Saved emissions of CO2 (in tons) | 271,965 | 1,087,038 |
| | | |

Source: IEP

The introduction of the mandatory deposit-refund system for single-use beverage PET bottles and cans would bring a benefit in the **reduction of littering** in the amount of EUR 0.68 to 3.4 mil. As today there is no comprehensive estimate of nationwide littering, we can use only partial estimates included in street cleaning, water-course cleaning in the Košice region (Bodrog river-basin, Ružín and Zemplínska Šírava) and the estimate of costs of cleaning of beverage PET and cans from roads. The real benefits of the deposit-refund system in the form of lower littering may be, however, considerably higher, which is suggested by the approximated estimates from the Czech study of IEEP for Slovakia, which represent the basis of the upper level of estimate (Jílková, et al., 2008). The increased rate of return of PET will also mean lower costs of landfilling. Today, a part of PET packaging is also in the mixed municipal waste. Here, we also expect the reduction of quantity, thus, also the reduction of landfilling costs by EUR 53 to 690 thousand.

Following the Scottish study of Eunomia, a positive influence on **employment** can be expected in the amount of 250-360 new permanent jobs, which is equal to a single benefit for economy in the amount of EUR 3.4 to 4.8 mil. (Hogg, et al., 2015). The estimate is based on the expert estimate of the Institute of Financial Policy as a weighted added value in common prices per employee.



The increased PET and aluminium recycling will lead to **environmental benefits** in the amount of EUR 3 to 11.6 mil. in the form of saved energy and material, as well as lower emissions of CO_2 equivalents⁷ in comparison with the production of the primary raw material. Recycling is especially efficient for aluminium, where up to 90-95 % of energy can be saved and secondary aluminium can be used for the same purpose. On the contrary, the recycled PET does not have the same properties and usage as primary PET. The value of CO_2 equivalent emissions savings comes from Turner, et al. (2015) and it is based on the comparison of emissions in producing the primary and secondary raw material.

It is only a part of positive environmental impacts. Moreover, the introduction of the deposit-refund system will lead to many **indirect environmental benefits that can be hardly quantified**, for example in the form of a higher aesthetic value of cleaner territories where litter was lying around or a lower load on ecosystems due to lower presence of non-biodegradable material in the wild. What is more, we are still not able to express the benefits of reduced plastic littering for population health as the research of health impacts of microplastics is at the beginning.

5.2 Additional costs of the system

The main indirect costs include the reduced revenues in the system of separate collection, and the reduced comfort of the population, which will have to return bottles to shops.

Table 9: Indirect costs of the mandatory deposit-refund system

| Item | Lower limit (EUR) | Upper limit (EUR) |
|---------------------------------------------------------------------------|-------------------|-------------------|
| Net influence on separate collection | -4,140,998 | - 10,707,097 |
| Lost revenues from the sale of PET raw material in separate collection | -5,720,893 | -5,720,893 |
| Lost revenues from the sale of cans in separate collection | -1,825,354 | -1,825,354 |
| Lost income from producers' fees for PET | -2,554,420 | -2,554,420 |
| Lost income from producers' fees for cans | -606,430 | -606,430 |
| Saved costs of separate collection of waste | 6,566,099 | 0 |
| Costs of the reduced comfort of consumers | - 13,869,301 | - 21,393,563 |
| Costs of storage of bottles in the household | - 7,524,261 | - 15,048,523 |
| Costs of work for returning the bottles | - 6,343,040 | - 6,345,040 |
| | | 0 (FD |

Source: IEP

The introduction of the mandatory deposit-refund system for beverage PET and aluminium packaging will lead to the **loss of revenues** of EUR 4.1 to 10.7 mil. **in the current system of separate collection**, which is provided for by the producer responsibility organisations (PRO). On the one hand, the system costs will be reduced because there will be less raw material for collection and sorting (this will increase the capacity of the available structure), on the other hand, valuable raw material will disappear from the vessels and the revenues of PRO from the sale of material and fees paid by producers today for the packaging will decrease. The lower limit of separate collection cost savings is based on the annual costs of collection and quantity of PET, which is today in the yellow vessels. However, it is possible that the real savings will be lower because the frequency of collection will not be reduced equally to the reduction of plastics in the yellow vessels, thus the total loss of separate collection revenues will be bigger. The upper limit was set as a possibility that the costs will not be reduced at all.

As the inhabitants will have to return empty beverage packaging back to shops, the introduction of the deposit-refund system will bring **reduced comfort for inhabitants** with a value of about EUR 13.9 to 21.4 mil., i.e. EUR 2.55 to 3.94 per citizen. We expect that they will connect the returning of packaging with



⁷ We took into account the price of CO₂ equivalent of EUR 31.

shopping, thus, the discomfort itself represents the time necessary for returning the beverage packaging as well as the space of the households for temporary storage. IEEP estimates that an average person will return 12 beverage packages. In such case, the costs of the returning of bottles (when time is priced by the average nominal wage in the economy) represent EUR 6.3 mil., i.e. about EUR 1.17 per citizen. The costs of storage (taking into account the average price of lease of flat area) amount to EUR 7.5 to 15 mil., depending on whether the consumers place them next to each other or in one bag. Unit cost is EUR 1.39 to 2.77 per citizen or EUR 4.06 to 8.13 per household.



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Annexes

Annex 1: Calculation of an optimum deposit amount

The rate of return depends on the deposit amount. The higher it is, the higher the motivation of people to return the beverage packaging. Therefore, if we set the target of return rate to 90 %, we will not reach it with any deposit amount only with the amount based on the mutual relation of these values in the form of logarithmic function, see (Eunomia, 2012) and (Hogg, et al., 2015). Based on Reloop data (2016) on the amount of deposits and rate of return, which were adapted to price conditions in Slovakia through the purchasing power parity, we came to the result that if we want to achieve a 90 % rate of return, we need a fee amounting to at least 12 cents with PET bottles and with cans 10 cents.

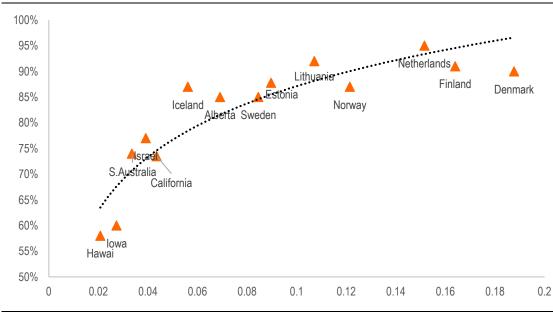


Chart 6: Logarithmic function of the deposit for PET packaging (rate of return vs. deposit in PPP EUR)

Source: IEP pursuant to reloop data

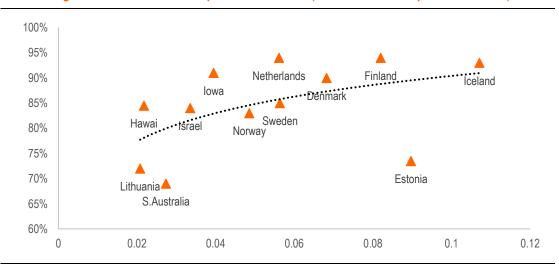


Chart 7: Logarithmic function of the deposit for aluminium (rate of return vs. deposit in PPP EUR)

Source: IEP pursuant to reloop data



Annex 2: Test of sensitivity

The rate of return affects both the operating costs and operating revenues. The higher the rate of return, the higher the costs of system operation and revenues from the sale of material. On the other hand, the revenues from uncollected deposits decrease with the rate of return.

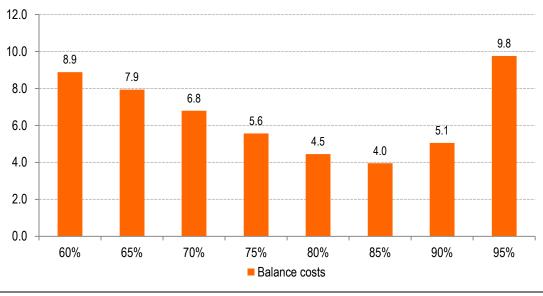


Chart 8: The amount of balance costs for various rates of return (in mil. EUR)

Source: IEP

The prices of secondary PET and aluminium from cans vary within the range of +/-8 % for aluminium and +/-10 % for PET. The unstable prices affect the revenues of the system, thus, they affect also total balance costs which can rise or drop by as much as EUR 1 mil.

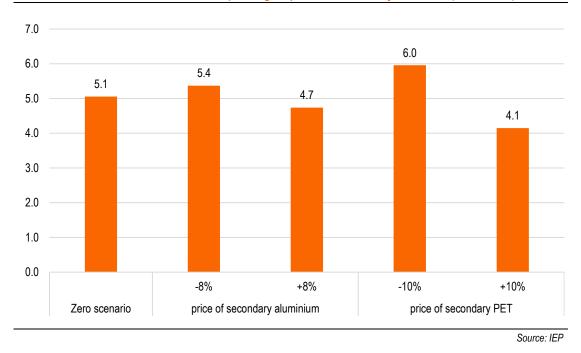


Chart 9: The amount of balance costs depending on prices of secondary materials (in mil. EUR)



According to the information available, the number of PET bottles and cans ranges from 723 to 1,526 million per year. The expected number of packages affects all types of costs. In case of a lower number of packaging in comparison with the zero scenario, the deposit-refund system is more expensive in terms of balance costs as well as administrative costs.

| Number of packages (mil. pieces) | Balance costs (in mil. EUR) | Investment costs (in mil. EUR) | Administrative fee amount (euro cent/ packaging) | |
|----------------------------------------|--------------------------------|-----------------------------------|-----------------------------------------------------|------------|
| • • | | | PET | can |
| 723 | 5.8 | 58.3 | 2.2 | 0 |
| 1,334 | 5.1 | 80.2 | 1.5 | -0.5 |
| 1,526 | 5.0 | 90.6 | 1.5 | -0.6 |
| | | | | Source: Il |

In the zero scenario we consider a 100 % involvement of hypermarkets, supermarkets, discount shops and organised shops, and with a 50 % involvement of unorganised shops in the deposit-refund system. In case of unorganised shops, their number is estimated to be 4,617 of shop units selling annually total 65 mil. pieces of PET bottles and cans. In examining the robustness of results, we considered the limit of involvement of unorganised shops, i.e. 0 % and 100 %, from which it results 51 % or 100 % of involvement of all shops. From the sensitivity analysis it results that the involvement of unorganised shops in the system, thus the total involvement of all shops has no significant impact on the investment costs. The balance costs vary within the range of +/- EUR 1 mil.

Table 11: Analysis of sensitivity to the rate of involvement in the system

| Rate of involvement | Balance costs (in mil. EUR) | Investment costs (in mil. EUR) | Administrative fee (euro cent/ packaging) | |
|---------------------|--------------------------------|-----------------------------------|----------------------------------------------|------|
| | | | PET | can |
| 51 % | 4.1 | 80.1 | 1.4 | -0.6 |
| 73 % | 5.1 | 80.2 | 1.5 | -0.5 |
| 100 % | 6.1 | 80.4 | 1.6 | -0.4 |

Source: IEP



Annex 3: Comparison of European mandatory deposit-refund systems

PET, cans, glass except milk

System establishment Rate of voluntariness Materials Deposit amount Return rate Automation 1996 cans, 2008 PET, PET 91 %, cans 94 % in Finland PET, cans and glass except milk EUR 0.10-0.40 97 % voluntary for producers, mandatory for retail 2012 glass 2017 (glass in 2014 - 89) PET except juices and milk but including alcohol 1994 PET. 1984 cans 95 % Sweden EUR 0.10-0.20 85 % in 2016 mandatory for producers, voluntary for retail PET, HDPE, steel, aluminium - except for fresh juices, concentrates, PET 87 %, cans 83 % in 1999 93 % Norway EUR 0.11-0.26 mandatory for retail nectars, syrups, vegetable drinks, milk and cocoa 2016 PET, cans and glass, exceptions: packaging smaller than 0.1 L and over mandatory for retail (less than 200m2 only the 2003 3 L, ecological packaging, reusable packaging, milk products, fruit and 80 % Germany **EUR 0.25 EUR** PET 98 %; Cans 96 %8 goods which they sell) vegetable juices, diet products for toddlers 2002 total 90 % in 2017 80 % Denmark PET, cans, glass except juices, cocoa, wines, spirits and milk EUR 0.13-0.34 mandatory for producers, voluntary for retail mandatory for producers, mandatory for retail cans: 73.5 %. PET: 87.8 %. over 200 m2, between 20-200 m2 they can apply 2005 PET, cans, glass except spirits, wine, Tetra Pak and glass jars 94 % Estonia **EUR 0.10 EUR** for an exception, no collection is mandatory for glass: 88.7 % less than 20m2 2014 92% mandatory for retail over 300m2 Lithuania PET, cans and glass from 0.1 to 3 L except milk, wine and spirits **EUR 0.10 EUR** 89 % plastic over 0.5 L except medicine beverages, wine, spirits, strong alcoholic beverages, cardboards, packages for direct sale with 2005 **EUR 0.25 EUR** 95 % for PET 89 % Netherlands beverages, packages with a volume less than 1 decilitre, and beverages, where the producer proves lower annual sales than 500 thousand pieces total 90 %; cans 94 %, PET 1989 Iceland PET, cans and glass except milk and milk products and juices **EUR 0.13 EUR** Mostly manually 87 %, glass 86 %

Table 12: Overview of European mandatory deposit-refund systems

2005

Croatia

Source: IEP pursuant to reloop and communication with central systems of individual count

Mostly manually

NA

NA

mandatory for retail over 200m2



EUR 0.07 EUR

up to 90 %

35

⁸ Rates of return in Germany (and Croatia) are not very comparable to the other countries because in the Scandinavian model of deposits, the central system transparently monitors every beverage packaging, whereas in the German model, the producers declare themselves the quantity of beverage packages placed on the market and returned.

Annex 4: Impact of the deposit-refund system for single-use beverage packaging on separate collection

Deposit-refund system introduction will lead to an annual loss in the separate collection system of about EUR 4 mil. The loss will have to be settled by producers of the other packaging and non-packaging goods. They will pay for a ton of the plastic or metallic packaging 1.3 times and 1.7 times more than today, respectively. Moreover, the approved objectives of collection will need adjusting so that they will take into account the exclusion of selected beverage packaging from separate collection. The deposit-refund system will not have a negative influence on the sorting of other waste components. Experience from abroad does not suggest any decrease in the rate of recycling in the countries with deposit-refund system.

The direct financial impact of deposit-refund system on separate collection will amount to EUR 4 mil.

The introduction of a mandatory deposit-refund system for PET and metallic beverage packaging will exclude the packaging from the system financing the separate collection in municipalities and towns and lead to a loss of revenue in the system of separate collection provided by Producer Responsibility Organisations (PRO). Although costs of the system will decrease because there will be less raw material for collection and sorting (which will increase the capacity of the available infrastructure), lack of valuable raw material from containers along with the lost fees paid today for the packaging by producers will lead to the system's loss. At present, net costs of system operation amount to approximately EUR 40 mil⁹.

On the one hand, separate collection will lose revenue from the fees of producers and sale of valuable raw materials - PET and aluminium. On the other hand, its costs of collection will decrease as the quantity of wastes in the containers for plastics and metals will considerably drop. In contrast to the original estimate in the study "Real Price of Deposit", we use more detailed data at the level of individual PROs to estimate the additional costs. We estimate an impact on separate collection of about **EUR 4 mil. per year** in comparison with 2017. We estimated gross costs of individual PROs from the data on net costs, quantities of individual types of waste collected and redemption prices. We calculated the total gross costs of the separate collection system as the sum of gross costs of PROs; the collected quantities were reduced by the expected quantity of PET bottles and aluminium cans separated for each PRO.

Table 13: Estimated loss of separate collection (in millions of Euros exclusive of VAT):

| Net loss | | 3.99 |
|-------------------------------------|---|------|
| Saving of gross costs of collection | - | 7.32 |
| Loss from aluminium sale | | 1.86 |
| Loss from PET sale | | 4.88 |
| Loss from fees | | 4.58 |

Source: calculations of IEP according to activity reports of PROs

PROs will have to cover the loss subsequently by higher fees for producers of other plastic and metallic packaging. The estimated fee for plastic packaging would be 1.3 times higher and for metallic packaging 1.7 times higher.

Collection objectives from 2022 will have to be adjusted

If we want collection objectives to be relatively equally ambitious even after the deposit-refund system has been introduced, they will have to be reviewed because their valid calculation also includes PET bottles,

⁹ Net costs include the costs of collection, sorting and recovery of waste from households, including reverse vending points and school collection, and do not include costs of collection of waste out of households or costs of promotional activities and education.





which will be excluded from separate collection. Starting from 2019, the so-called objectives of collection are in force; they determine the minimum quantities of waste to be collected by PROs in each year. These objectives are based on the so-called collection potential, which sets on the basis of waste composition analyses, how many kilograms can be maximum separated from municipal waste. According to the proposed objectives, 40, 50, and 60% of the potential should be gradually separated. The 60-percent collection objective is set for the period from 1 July 2021 to 30 June 2022, and the deposit-refund system will be in force from February 2022. The rate of return of both PET bottles and cans is expected to reach 90 % in 2024. Thus, the potential will drop from 572 thousand tons to approximately 531 thousand tons from 2024. The fulfilment of the objective in the amount of 60 % of rate of separation from the potential would mean 59 kg/inhabitant/year in comparison with the original objective 63 kg/inhabitant/year.

The deposit-refund system does not affect the rate of recycling

Several critics point out that the deposit-refund system discourages people from separation. However, this relation has never been proved. The only country in Europe, where the rate of separation dropped after the deposit-refund system had been introduced, is Germany. However, at the same time, a system change in the extended producer responsibility scheme was made and the quantity of waste from plastic packaging undergoing energy recovery considerably increased. In 2004, the rate of recycling decreased by 4 percentage points in comparison with 2003 (introduction of the deposit-refund system); in the next years, the rate of recycling has been increasing again. Yet, while in 2003, less than 47 thousand tons of plastic packaging underwent energy recovery in Germany, in the next year, the quantity increased twice and in 2005, the quantity reached 200 thousand tons. Since 2007, Germans have incinerated 1-1.5 million tons of plastic packaging per year. Moreover, the data on the quantity of recycled plastic packaging reported in Germany before 2004 essentially differ from the rest of the EU, which suggests that even the methodology could have been changed.

According to Eurostat, the rate of recycling of plastic packaging in the countries with a deposit-refund system is by about 3 % higher than in the countries without any deposit-refund system. The rate of recovery of plastic packaging is markedly different in the countries with a deposit-refund system, however, this relation is not statistically important. As a matter of fact, the rate of recovery depends on the ban on landfill of mixed waste in the country; the ban on landfill leads to an increase in the rate of recovery of plastic packaging by 26 %. According to estimates of IEP, deposit-refund system introduction will increase the rate of recycling in Slovakia by 0.5 percentage points. However, it must be noted that Eurostat data is not well comparable because it has different bases in various countries, even varying with time (which apparently also applies to Germany).

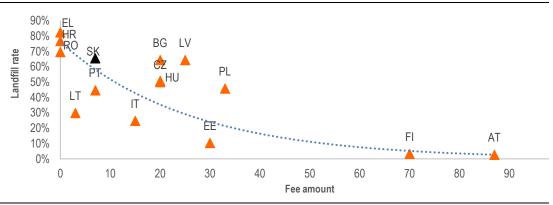
A consumer research carried out in Lithuania, the latest country, which has introduced a deposit-refund system, has shown that 97 % of consumers consider the system to be important and are satisfied with it. As many as 95 % of consumers confirmed that the quantity of litter lying around had been reduced and 93 % admitted that the introduction of the system had motivated them to higher responsibility in separating all types of wastes. The research was carried out two years after the deposit-refund system had been introduced. At the beginning of this year, a research performed in the Czech Republic was published, according to which <u>86 % of Czechs</u> tend to support the deposit-refund system.



Annex 5: Potential of separate collection for plastics and DRS

The deposit-refund system for PET bottles is the only one that can provably reach a rate of return of more than 90 %. Belgium, Austria and Switzerland are countries with the most developed system of separate collection in Europe and reach a rate of separation of PET bottles of 73 to 90 %. Getting closer to the results of these countries would require additional costs of collection, areawide introduction of pay-as-you-throw system, additional considerable increase in fees for landfilling or a complete ban on landfill, investments in infrastructure, and gradual change of citizens' awareness.

The motivation of citizens to separate waste depends in particular on the total costs of waste and amount of fees for landfilling (or a complete ban on landfill). High fees represent the basic instrument of governments to divert the waste stream from landfilling to recycling or energy recovery. Countries with higher fees for municipal waste landfilling reach on average a considerably lower rate of landfill. According to Eurostat data, countries with the ban on landfill of flammable municipal waste reach an average rate of landfill of 7 %, whereas countries without such ban place on average 47 % of municipal waste in landfills. The ban on landfill of flammable mixed municipal wastes is in force in nine EU countries and in Switzerland.





Source: Eurostat, CEWEP

Efficient introduction of pay-as-you-throw (PAYT), availability of infrastructure for separation, and environmental education have a significant influence on the rate of separation, too. According to estimates of several analyses (the Netherlands 2009, the Netherlands 2014, Japan 2013), PAYT reaches a rate of separation higher than the system with lump fees. According to an EEA study the countries with PAYT in place reach the overall rate of recycling over 45 %, whereas countries without such system reach a rate of recycling lower than 20 %. In Slovakia, such competence is in the hands of municipalities and according to IEP survey, only about 160 municipalities utilise this possibility. Thus, over 95 % of all municipalities fail to motivate financially their citizens to avoid and separate waste. The distance and availability of infrastructure for separate collection affects the will of citizens to separate. Results of researches focused on municipal waste show that the optimum carrying distance ranges from 50 m to 150 m. The ban on landfill and incineration of certain types of wastes or high fees in the form of environmental taxes in such waste management motivate to separate.

Countries with the best system of separate collection reach the rate of separation of PET bottles of 73 to 90 %. Belgium, Austria and Switzerland reach a high provable rate of separation of plastic bottles. However, their conditions in waste management are different in comparison with Slovakia. The reasons include in particular high fees for landfilling or a complete ban on landfill, consistent application of PAYT, well-adjusted infrastructure and a high level of environmental awareness in the long term.

The rate of separation stagnates even in the best countries. Belgium and Switzerland succeed in achieving a high rate of recycling of over 80 %, which means that the rate of separation also achieves such or even higher values. However, in the long term the rate of separation stagnates, except for Belgium, where





a slight growth is recorded. In Austria, the rate of separation has been about 75 % in the long term, whereas the rate of recycling is only 57 %.

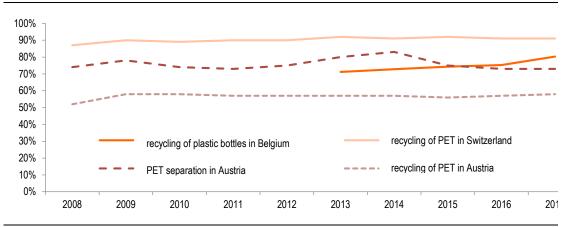


Chart 11: Development of the rate of separation of PET bottles in the countries with the most developed

Countries with excellent separation of PET bottles provide for the infrastructure intended solely for this waste stream and have PAYT of mixed waste in place (which includes both the transport and environmental costs connected with the disposal). In Switzerland, which achieves the best results, there is a scheme of PET collection out of the other separated components, and the separation is for free for citizens. On the contrary, the costs of mixed waste are fully borne by citizens in the price of collection bags for mixed waste. Belgium has a bag system for PET, HDPE, aluminium and Tetra Pak. Citizens must buy collection bags for separated waste and its price is on average 10-times lower than the price of bags for mixed waste. In order to achieve higher purity and quality of material about 40 % of Austria's territory separate only PET bottles within plastics. The rate of separation stagnates as a consequence of insufficiently developed PAYT.

Box 5: How the best ones do it

In Austria, <u>the fee</u> for mixed waste collection is mostly calculated according to the capacity of the container and frequency of its emptying. The collection of separated components is financed by producers. There are two models for separation of PET bottles in <u>Austria</u>. About 60 % of territory separate PET bottles together with the other plastic packaging. In Vienna, a part of Lower Austria, Salzburg and Carinthia, only plastic bottles are separated so that more recyclable and pure material is obtained. The rest of nonrecyclable plastic packaging in these areas is recovered in energy incineration. According to <u>reports</u> of the beverage industry, on average 76 % of PET bottles are recycled in Austria; their recycling stagnates at a level of 57 %. Thus, the fees adjusted according to the size of container and frequency are not sufficiently motivating. For example, in Vienna, the <u>minimum</u> size of container is 120 L and minimum frequency is once a week. It means that citizens are not motivated to reduce the quantity of mixed waste below that limit as they still have to pay for it.

In <u>Belgium</u>, only plastic bottles produced from recyclable materials, such as PET and HDPE, are collected within separate collection for plastics in so-called PMD bags. Other types of plastic packaging, such as yoghurt pots, belong to mixed waste, which is recovered in incineration plants. According to <u>annual reports</u> of Fost Plus, recycling of plastic bottles reached 80 % in 2017. The high rate of separation results from the PAYT of mixed waste that has been in operation for a long time. In certain parts, PAYT for bulky waste and biowaste is also in place. PAYT commenced in the mid-1990s and considerably expanded in 2004; since 2002, the government has subsidised the infrastructure for collection weighting and digitising. Collection is carried out by means of collecting bags purchased by citizens or containers with chip and



Source: FostPlus, PRS PET Recycling, WKO

weighting system. Prices of bags are set by law. According to <u>OVAM</u>, the rate for municipal waste ending in incineration plants ranges from 1.3 cents to 4 cents/L in bags or from 11 to 32 cents/kg, if collected in containers. The costs of packaging waste collection and processing are borne by producers; therefore, the price for the so-called PMD bag only covers the costs of its production. The average <u>price</u> of bag is 0.26 cents/L, which is a price several times lower than the rate for mixed waste. The bags are transparent so their contents can be checked. The price difference and checks provide citizens with price stimulus for proper separation. The ban on incineration of certain wastes, as well the environmental tax on incineration amounting to almost EUR 13/ton are in place in Belgium. This encourages local governments and PROs to provide sufficient infrastructure and education for separate collection.

In <u>Switzerland</u>, collection of exclusively PET bottles has been in place since 1990. Collection is financed by the beverage industry through the <u>fee</u> amounting to 1.9 and 2.3 centimes according to the size of the bottle. Retail trade has the statutory duty to collect empty PET bottles in special collecting containers or bags, which they must purchase. Municipalities, schools, companies, filling stations, organisers of festivals and concerts are also voluntarily registered as collection points. Removal of full bags is provided free of charge. In total, there are 50,000 official collecting points in Switzerland, where citizens can throw away empty bottles for free. Containers or bags for collection directly in households are not used due to logistic, cost and ecological reasons. According to <u>annual reports</u>, the average rate of recycling of PET bottles reaches 90 %. The reason is the low price in comparison with mixed waste disposal. <u>The average price</u> of a collecting bag for mixed waste amounts to 6.2 centimes/L. This price also includes the costs connected with collection. The bag for the collection of PET bottles costs on average only 0.2 centimes/L.

In countries such as Belgium or Austria, total citizens' costs of municipal waste are several times higher. According to data from the Statistical Office of the Slovak Republic on the amount of fees for mixed municipal waste, citizens in Slovakia pay on average EUR 96/ton for unsorted waste (weighted average). In the countries with a high rate of separation, these costs are 2 to 4-times higher and to a great extent reflect the higher costs of collection itself. For example, net costs of separate collection of plastic bottles are currently 2 to 3-times higher in the countries with the best results than in Slovakia and they are close to costs of the deposit-refund system. While in Slovakia it is about 0.4 cents for one PET bottle, in Austria it is 2.2 cents. Estimated costs of the deposit-refund system in the conditions of the Slovak Republic amount to 1.5 cents per bottle.

If we increased the fees for landfilling to a level comparable with the best countries, average annual costs of municipalities would increase in the following years in comparison with the currently planned increase by EUR 22 mil. With the introduction of new fees for landfilling valid from the next year, the cumulative costs of mixed municipal waste are estimated to be EUR 60 mil. for the period 2019 – 2021, whereas in 2017 they amounted to EUR 9.1 mil. If the fees were further increased to the level of the countries with a high rate of separation, the costs would achieve as much as EUR 126 mil.

Citizen's costs of non-separation must be higher than those of separation. The countries with a high rate of separation have higher costs of disposal of mixed waste than costs of separation. Even with an increase in fees for landfilling from 2021, the total costs of non-separated bottle in Slovakia will be too low. It is also caused by a low lump fee for mixed waste in Slovakia amounting to 0.3 cents per bottle. In Belgium, Austria and Switzerland, the fee is 2 to 23-times higher even after the conversion to the price level.

| | Switzerland | Belgium | Austria | Slovakia |
|----------------------------------------|-------------|-----------|---------|-----------|
| Costs of mixed waste (EUR/ton) | 375 | 177 - 215 | | 96 |
| Costs of mixed waste (EUR PPP/ton) | 169 | 109 - 132 | | 96 |
| Rate of separation of PET 2017 | 91% | 80% | 73% | 63% |
| Ban on landfill of municipal waste | yes | yes | yes | no |
| Fee for landfilling (EUR PPP/ton)* | | 64 | 54 | 11 - 33 |
| Fee for incineration (EUR PPP/ton) | | 8 | | |
| *for the wastes that can be landfilled | | | | Source: I |

| Table 14: Countries | with high rate | of separation have | higher costs of | landfilling |
|---------------------|---------------------|--------------------|-----------------|-------------|
| | - millin mgn rate . | or ooparation navo | ingher boote of | ananng |

for the wastes that can be landfilled

The deposit amount is the main motivation in the deposit-refund system. The data from Reloop on deposit-refund systems in individual countries shows a statistically important positive relation between the amount of deposits and rate of return. A deposit amount adjusted correctly in the conditions of the respective country is important to achieve the required rate of return.

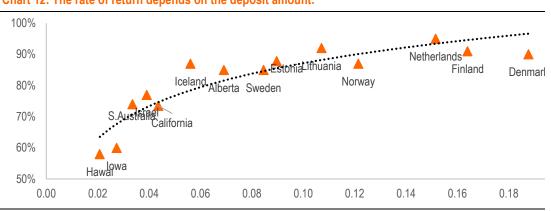


Chart 12: The rate of return depends on the deposit amount:

Source: IEP pursuant to Reloop data

A correctly set-up deposit-refund system provably reaches an average rate of return of 88 %. According to the summary of countries with a deposit-refund system from Reloop, the deposit-refund system reaches a rate of return of 85 to 98 % for plastic bottles in Europe. In the States of the USA, where the system is mostly decentralised and the low deposit does not motivate to return, the system reaches on average 70 %.

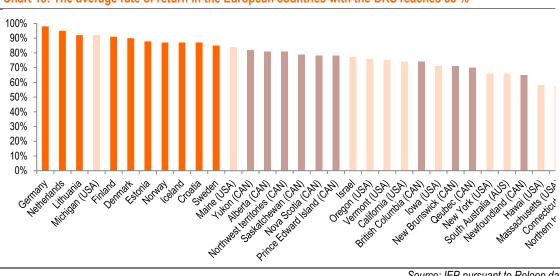


Chart 13: The average rate of return in the European countries with the DRS reaches 88 %

Source: IEP pursuant to Reloop data

The deposit-refund system is in place in 39 countries of the world, additional countries will introduce DRS in the following years. The deposit-refund system is in place in eight countries of the EU and in two



more countries of the EEA (Norway and Iceland). Moreover, it exists in 10 States in the USA, 12 provinces of Canada, four provinces of Australia. Further countries include Israel and the islands Kiribati, Palau and Kosrae. In 2020, Belarus is going to introduce a deposit-refund system for all types of beverage packaging. <u>Romania</u> is going to introduce the system for re-usable beverage packaging in 2019 and subsequently for single-use beverage packaging in 2022. <u>Scotland</u> announced the plan of introduction in May 2017, England considers a similar intention. At present, Malta also introduces a deposit-refund system.

Deposit-refund system provides for sustainability, high quality of materials, thus, also a higher price.

Quality of collected material is important for circular economy. Nowadays, PET material is recycled to flakes used for production of fibres or pellets serving to produce new beverage bottles. According to <u>Recircula</u>, only 52 % of material from separate collection is suitable for recycling, the rest of it is landfilled. Such material can be used for the production of fibres, however, after they have been used in the textile industry, they cannot be recycled again and they end in incineration plants or landfills. The material coming from the deposit-refund system achieves a rate of purity of 93 % and is suitable for production of new beverage bottles. However, this process cannot be repeated over and over again in contrast to glass or metal and the properties of the material gradually worsen.

