

Proposals towards the design of a Greek Deposit Refund System

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Introduction

Following the latest regulatory developments, a mandatory Deposit Refund System (DRS) is to be set up by 1 January 2029 for all single-use plastic and metal beverage containers up to 3 litres in all EU Member States.

In Greece, in October 2020, Law 4736/2020 concerning the reduction of the impact of certain plastic products on the environment was published in the Greek Official Gazette. The law transposes the EU's Single-Use Plastics Directive (SUPD) into Greek national law and introduced a DRS for single-use PET beverage containers. Less than a year later, in July 2021, Law 4819/2021 entered into force, effectively adding aluminium cans and single-use glass beverage bottles to the scope of the DRS. Following the adoption of the Joint Ministerial Decision in July 2022 (Government Gazette B' 3883/21-07-2022), a new DRS scheme in Greece is aimed to commence in July 2023.

Scope and Objective

In this context, this study that Eunomia conducted in 2022 has proposed a design for Greece based on design features that have proved to be effective in other countries. Greece's particular characteristics – in terms of geography (island municipalities), high touristic season, and the significance of the hospitality sector - raise particular challenges for the system operator, however it also presents key opportunities.

Recommendations

The table below demonstrates how an effective DRS scheme could be implemented in Greece, taking into consideration specific design elements.

Table 1: Proposed DRS Design for Greece

Design Element	Recommended for Greece
System Governance	Single centralised CSO; privately owned and operated by industry. The collective interests of all industry players should be represented. Government should provide oversight and auditing.
Return Rate Target	90% return rate target (within three years from 1 st day of operation)
Scope – Beverage Containers	Scenario 1: PET bottles, aluminium cans, glass (100ml to 3 litres) Scenario 2: PET bottles, aluminium cans (100ml to 3 litres)
Scope – Beverage Type	Scenario 1: Water; soft drinks (carbonated, non-carbonated, juices, sports drinks, ready to drink teas and coffees); beer; wine & spirits Scenario 2: Water; soft drinks (carbonated, non-carbonated, juices, sports drinks, ready to drink teas and coffees); beer
Deposit Value	Minimum deposit fee fixed in legislation - €0.10 flat rate deposit across all container types, subject to periodic review
Labelling & Fraud Prevention Measures	CSO-issued logo and choice of Greek-specific or international barcode, with a higher producer fee for international barcodes.
Return Infrastructure	Return to retail, with universal take-back obligation. Consider a network of bulk-compacting RVMs in strategic locations (especially with high tourist footfalls and in areas with a high density of HORECA retailers).

Design Element	Recommended for Greece
Handling Fees	Handling fee based on the average costs that retailers incur. Handling fee for compacting RVMs will be higher than for manual take back (in order to reflect retailers' costs, assuming the RVMs are the retailers' responsibility)
System Funding	System funded by material revenues (owned by CSO); unredeemed deposits (owned by CSO); and producer fees (set by CSO).

The long-lasting experience from the Norwegian deposit return system, one of the most successful DRS for single-use beverage containers globally, represents an added value for the Greek market.

The figure below demonstrates a typical DRS flow diagram, as developed by Eunomia, highlighting that such system can bring specific benefits to a single Member State such as: increase recycling, improve the quality of materials collected and reduce marine litter.

Figure 1: DRS flow diagram

