An EU funded project
Projekat finansira Evropska unija

Municipal Infrastructure Support Programme
Building together for the future

Program podrške razvoju infrastrukture lokalne samouprave
Gradimo zajedno za budućnost

An EU funded project
Projekat finansira Evropska unija

Municipal Infrastructure Support Programme
Building together for the future

Program podrške razvoju infrastrukture lokalne samouprave
Gradimo zajedno za budućnost

Waste Recovery and Recycling under the Law for Packaging and Packaging Waste

An EU funded project
Projekat finansira Evropska unija

Municipal Infrastructure Support Programme
Building together for the future

Program podrške razvoju infrastrukture lokalne samouprave
Gradimo zajedno za budućnost

Producer Responsibility Schemes

- Government sets targets for waste recovery and recycling
- Waste generators are responsible for meeting the targets
- Waste generators establish "Operators" and pay them for collection and getting the recovered waste to recyclers
- Operators collect from end users and contract with recyclers
- (Operators may contract PUCs and receive materials from them, but usually set up their own channels for collecting separate waste streams)
- Government supervises and monitor to ensure that targets are met

Product Charge Schemes are implemented by Government

- Government imposes product charges
- Revenues from product charges go the an Environmental Fund
- Environmental Fund pays subsidies to authorized collectors
- Environmental Fund pays subsidies to recyclers
- Waste generators are not directly responsible for meeting targets

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

Note: Roles are just about reversed in the two systems

- In producer responsibility scheme waste generators are responsible for recovery, for getting the waste to recyclers, and for paying (to Operators) for the system.
- In product charge system Government (Environmental Fund) appoints agents for recovery and recycling and provides financial support for their operations
- Government doesn't finance the operations, supervises if targets are met.

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

Obligations in the two systems

- Obligations are limited to those who are responsible for meeting quantitative targets:
  - Waste generators in producer responsibility schemes and
  - Environmental Fund and its agents in a product charge systems
- *Note: PUCs don't have to have direct responsibility/obligations in either system. Operators may conclude voluntary contracts with PUCs*
- *Note: no obligations on end users are necessary or usual in either system*

The Packaging Law of Serbia

- Distinguishes between municipal and non-municipal packaging waste
- Non-municipal packaging waste is by definition waste not collected by PUCs. “non-municipal waste “ is “primary and secondary packaging waste ..../from/ manufacturing process, retail, service providers and other activities which has not been collected by PUCs ....” Article 5)
- Therefore municipal packaging waste is by definition packaging waste collected by PUCs

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

Responsibilities for Municipal Waste

- End users – that is households , commerce, institutions – must source separate waste (Article 20)
- It would follow that PUCs are obliged to collect separately the municipal packaging waste (although not stated explicitly)
- It also follows that PUCs are responsible for getting the separated packaging waste to recyclers

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

Responsibilities for non-municipal waste

- With the right of end users to return packaging waste to suppliers and other waste generators (Article 18) the waste thus accepted /obligatorily/ by suppliers waste thus returned becomes municipal waste.
- Article 18 for forbids passing on non-municipal waste to PUCs “unless prescribed so by appropriate agreement”
- Therefore the waste generators and their “Operators” have to set up collection systems for the non-municipal packaging waste
- Waste generators must also get the packaging waste they collect to recyclers (Article 23 and 24)

The Role of the Environmental Fund

- Receives money from product charges from Waste Generators
- Will use the revenues for "waste management " in general
- Different from the National Waste Strategy: "Collection and treatment of .../special waste streams/ ....will be performed by entities who have permits for waste management and who will be remunerated by the Fund for their services."
- *Note: the Packaging Law is mute on this*
- *Note : There are no operators as agents of the Fund in the Packaging Law, the only operators are the agents of the waste generators.*

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

Two Streams of Packaging Waste to Recyclers

- Municipal waste: end users ➡ PUCs ➡ recyclers
- "Non-municipal waste ":
  - operators /waste generators ➡ recyclers
    or
  - end users to retailers /other waste generators ➡ recyclers,
    or
  - retailers and other suppliers ➡ waste generators/Operators ➡ recyclers

Note: operators have to accept waste from end-users but not from PUCs

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

Producer Responsibility

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave
Product Charge System
Waste Generator
€ Product Charge
Environmental Fund
Product Charge Subsidy €
Recycler
Collectors
Agent of Environmental Fund
WASTE
PUC
End User
LEGEND:
Obligatory role
Voluntary role

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave
Serbian System Packaging Law
WASTE
Non Municipal
Waste Generator
€ Product Charge
Environmental Fund
???
Recycler
Operators
Agent of Environmental Fund
(NOT MENTIONED)
WASTE
Non Municipal
Municipal WASTE
Operators
Agent of Waste Generators
PUC
Municipal WASTE
End User
LEGEND:
Obligatory role
Voluntary role

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave
Who is accountable for meeting targets?
PUCs for municipal waste?
Waste generators for non-municipal waste?
which of the waste generators is responsible?
"Manufacturers, importers, packers/fillers/ suppliers"
Note: usually the obligor is defined as the person who
puts the product first on the market:
manufacturer and importer only
epksa
ROYAL HASKONING
VNG

What are the incentives? Is the system enforceable?

- For municipal waste: can source separation on households be enforced? On PUCs? With what targets?
- Why would end-users return waste to suppliers waste generators? (if they are not paid for it?

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

What are the costs and who pays ? for Municipal Waste

Costs:

- End-users cost of time and money for source separate
- PUCs for investment and operation of separate collection from end users
- PUCs for getting the waste to recyclers
- PUCs for storing, otherwise disposing of nonmarketable waste

Who Pays?

- End User through higher tariffs
- Municipalities through higher subsidies to PUCs=taxpayer
- "Manufacturers, importers, packers/fillers/ suppliers"

An EU funded project
Projekat finansira Evropska unija
Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

What are the costs and who pays ? for non-Municipal Waste

Costs of the Waste Generators:

- collection and transport form end-users
- Storage: investment and operational cost
- getting the waste to recyclers
- paying recyclers to accept waste?

Who Pays

- Waste generators for product charge
- Waste generators for the cost of their system
- Passed on to consumers and tax-payer
- "Manufacturers, importers, packers/fillers/ suppliers"

An EU funded project
Projekat finansira Evropska unija

Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

PLANA

An EU funded project
Projekat finansira Evropska unija

Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

PIROT

An EU funded project
Projekat finansira Evropska unija

Municipal Infrastructure Support Programme
Program podrške razvoju infrastrukture lokalne samouprave

Contact

Paul Dax
Senior Institutional Expert
381 63 45 24 34
381 11 36 90 987
pdax@misp-serbia.rs
www.misp-serbia.rs

Thank you for your attention!