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# Packaging Waste Audit

Assessment of the adequacy and effectiveness of the operations of the Department of Environment in relation to the packaging waste management in Cyprus

**May 2019**



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## Scope of the audit

To assess the adequacy and effectiveness of the operations of the Department of Environment (“the Department”) in relation to the management of packaging waste in Cyprus.



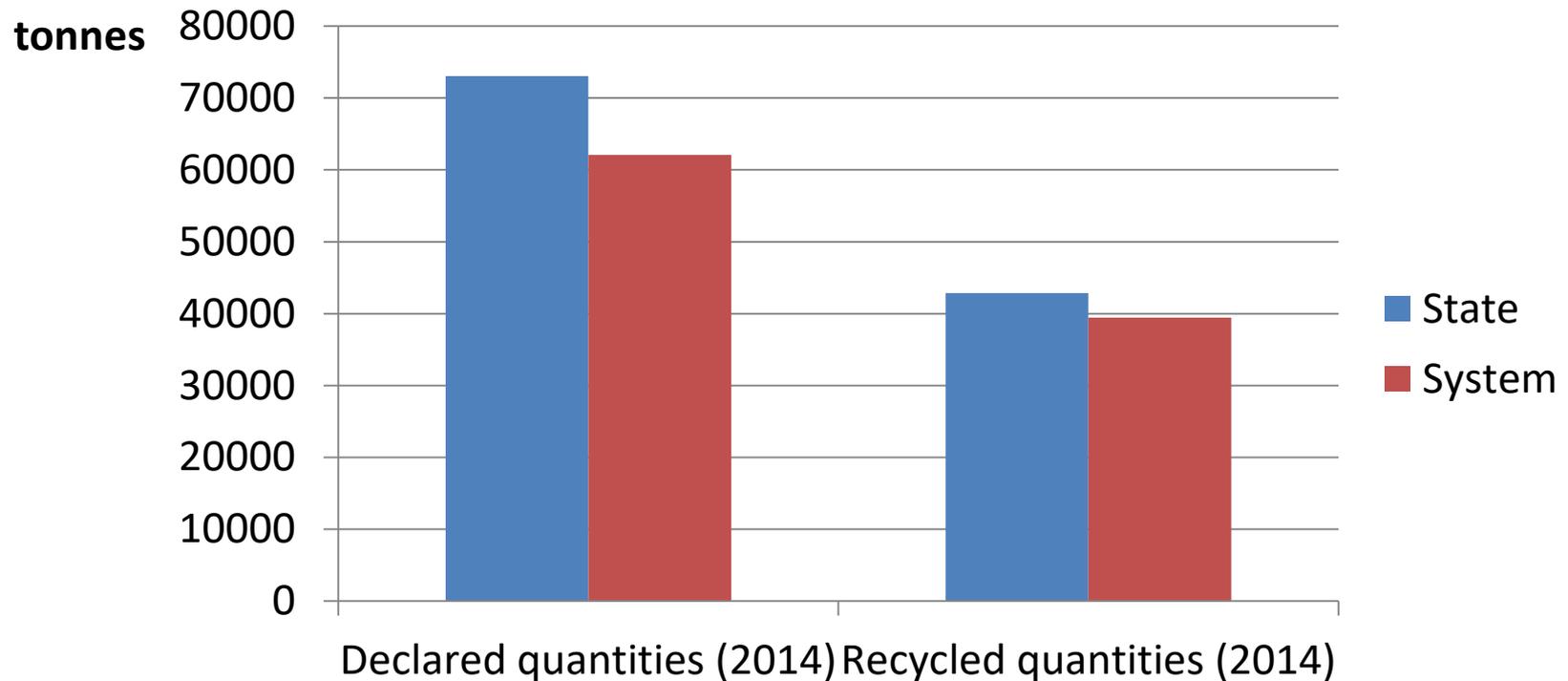


## Our audit focused on

an assessment of the adequacy and effectiveness of the supervision exercised by the Department, in the years 2007 to 2016, in order to verify the compliance of the single collective packaging waste management system that operates in Cyprus, with the terms of its Operation Approval and legislative provisions.



## The single collective packaging waste management system in Cyprus plays a critical role



Limits the effectiveness of the supervision exercised by the Department and the imposition of severe compliance measures



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# The most important findings of the audit and our recommendations



## I. General findings

- The System applies policies that are inconsistent with the nature of a non-profit organisation which is required by national legislation and its Approval – **Advice System to revise its policies.**

## II. Waste management by the System

- Up until March 2016, tetrapak, polystyrene and PVC waste instead of being managed by the System, they were included in the screening residue that ended up in landfills.
- In the publicity material of the System certain categories of packaging waste are explicitly excluded (e.g. nylon/ plastic bags, plastic cups and plates, plastic yogurt/butter packaging).
- The Approval requires the System to manage only the quantities of packaging waste required to meet the minimum annual targets and not those for which it has received fees from its producer-members.

➡ **Unlawful actions based on Attorney General opinion**

### III. Achievement of recycling targets by the System

- **Glass packaging waste management**
  - No achievement of the recycling target in the years 2007-2009 and 2012-2016 – **The Department should take appropriate action.**
  - No control is carried out on the correctness and the subsequent treatment of the glass waste delivered to the waste management facility.
    - ➡ No process of the glass waste in the years 2007-2009, 2011-2014 and only a portion of it in the years 2015 and 2016.
    - ➡ These quantities were included in the calculation of recycling targets.

**The pricing policy of the glass waste manager should ensure not only the receipt of the glass but also its efficient management.**

- **Paper packaging waste management**

- Since 2009, paper recycling rate exceeds 100% of the quantities declared as being placed on the market - **The Department should request the System to provide explanations.**



- In the years 2006-2012, the System included all non-packaging paper in the calculation of the paper recycling rate. From 2013 onwards, the Approval allows the inclusion of 30% of non-packaging paper waste in the calculation of the recycling rate.

➡ **Unlawful methodology based on Attorney General opinion**

- **Wood packaging waste management**

- To date, the System has failed to meet the wood recycling target.

- In the years 2007 - 2010 and 2013, the System did not manage any quantity of wood waste despite the fact that it undertook the commitment

on behalf of its members, in return for a financial fee - **Revision of Approval so that the System takes over only the proportion of producers' responsibility that is capable of responding and duly substantiating that capacity.**





- **Plastic packaging waste management**

- The System does not handle specific plastic materials (PS - polystyrene and PVC - clothes hangers), although it assumes its members' responsibility for their management, for a fee.
- The System charges its members with a higher fee for the management of the above materials compared to the fees charged for the management of other packaging waste.

**The Department should review the pricing policy of the System.**



## IV. Procurement procedures followed by the System for the purchase of collection services for paper, pmd and glass

- The System did not follow appropriate tendering procedures – **The Department should exercise adequate control.**
- The cost of collecting PMD and paper packaging waste is related to population costs (unit price @ inhabitant of the area covered) - **Collection cost must be related to the fuel cost and the total distance travelled.**



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**Thank you for your attention!**

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