Audit on
Effectiveness of collection and recovery of packaging waste in Estonia

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Generation and recovery of packaging waste in Estonia (2001-2009)

- Generation of packaging waste (t), whereof:
  - recovery (t)
- GDP (current prices, million Estonian kroons)
- Target recovery indicator

- Data for GDP and packaging waste from 2001 to 2009 is provided in the graph.
- The target recovery indicator is set at 50% for certain years.

(Note: The specific values and trends are not transcribed here as they are visualized in the graph.)
## Target recovery indicators for packaging waste in Estonia

<table>
<thead>
<tr>
<th>Type of packaging waste</th>
<th>Total recovery, incl. recycling</th>
<th>Excise duty (EUR/kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glass</td>
<td>70%</td>
<td>70%</td>
</tr>
<tr>
<td>Paper and cardboard</td>
<td>70%</td>
<td>60%</td>
</tr>
<tr>
<td>Metal</td>
<td>60%</td>
<td>60%</td>
</tr>
<tr>
<td>Plastic</td>
<td>55%</td>
<td>45%</td>
</tr>
<tr>
<td>Wood</td>
<td>45%</td>
<td>20%</td>
</tr>
<tr>
<td>Total weight</td>
<td>60%</td>
<td>55%</td>
</tr>
</tbody>
</table>

Source: Packaging Act, Packaging Excise Duty Act
Complexity of producer responsibility issues

Enterprise 1 → Enterprise 2 → Enterprise 3 → Enterprise 4 → Enterprise 5

Recovery organisation
(EPR, ETO, TVO, EPP)

Waste management companies (transport, sorting)

Waste treatment companies (reuse, reprocessing, incineration etc)

Excise duty
Background

• Two packaging waste collection systems:
  – deposit system for beverages
  – non-deposit system (containers) for all packages
• Economic instruments: obligation to collect packaging waste, packaging deposit, excise duty on packaging
• Packaging enterprises have obligation to submit data on packaging in Packaging Register and Waste Reporting Register
• Nation-wide public packaging collection system – free
Focus

Do state activities contribute to the recovery of packaging waste?

• Does the recovery of packaging waste meet the European Union target indicators?

• Does the system of collecting packaging waste from households ensure separate collection of packaging and municipal waste?

• Main auditees: Ministry of the Environment, Environmental Inspectorate, Tax and Customs Board

• Period: 2005-2009
Methods

• Data analysis and comparison of Packaging Register and General Waste Reporting Register
• Questionnaire for population on their packaging sorting awareness and habits
• Observations on packaging containers network – involvement of NAO staff
• Document analysis of:
  – legislation, research and projects
  – annual reports of recovery organisations
  – contracts between local authorities and recovery organisations
  – infringement proceedings by Environmental Inspectorate and Tax and Customs Board
• Interviews
Main problems

• It is unclear how much packaging is placed on the market
• National supervision is weak > 60 million EUR of excise duty was not claimed
• Verification of recovery is not sufficient
• Population is not aware of packaging waste sorting options
• Packaging collection network is insufficient and inconvenient for the public to use
Lessons learnt

• It is not possible to audit recovery organisations (NGOs, private entities) and packaging undertakings directly.
• There might be a need for regulating the producer responsibility issues (incl. packaging waste) more in “young democracy’s”
• Pay attention to methodology how the waste amounts (released on the market, recovery) are calculated and also controlled.
• Difficult to prove what happens with collected packaging waste (including exported waste).
• Communicate the doubts and concerns to registers holders and supervisory agencies.
• Keep in mind the waste hierarchy!
Thank You!

Report available in English at www.riigikontroll.ee (Publications > Audit reports > Ministry of the Environment > 2010)

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