



CIRCULAR ECONOMY  
MALTA



# CIRCULAR ECONOMY MALTA

Annual Report 2024

Beverage Container Refund Scheme



# OUR MISSION & OUR VISION

## Our Vision

To **reduce** the amount of waste generated by promoting individual and corporate responsibility.

To create the framework for the **recovery** and **recycling** of waste.

To enhance the utilization of **waste as a resource**.

## Our Mission

The Agency aims to foster and facilitate the **transition from a linear to a circular economy** through the effective governance of recyclable resources.

The Agency will measure its success on schemes and processes that enhance **innovation**, the **lengthening of the resource life cycle** and the **prolongment of recyclable material** on the market.

The Agency strives to influence the local culture and perceptions vis-à-vis the value of resources and reusable waste.



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# LIST OF ACRONYMS

**CEMalta** – Circular Economy Malta

**DRS** – Deposit Return System

**EU** – European Union

**KGs** – Kilograms

**S.L** - Subsidiary Legislation

**RVMs** – Reverse Vending Machines

**SUP** – Single-Use Plastic

**PET** - Polyethylene Terephthalate

**QTY** - Quantity

**PPWR** - Packaging and Packaging Waste Regulations



# Executive Summary



The past year has marked a period of meaningful progress for Circular Economy Malta (CEMalta) and the Beverage Container Refund Scheme, now in its second full year of operation. As the national regulator of the Scheme, our efforts in 2024 were firmly directed towards enhancing its accessibility, responsiveness, and long-term sustainability; always with the needs of scheme users and stakeholders at the forefront.

CEMalta’s regulatory work has been guided by a commitment to good governance, ensuring that transparency, accountability, and integrity remain central to every decision and action. Our role as regulator has required proactive engagement with societal and industry demands, and we have worked diligently to ensure these are addressed in a sustainable and inclusive manner.

Throughout the year, our focus remained on improving the Scheme’s service delivery, aligning it more closely with the expectations of the public and the operational realities of industry participants. This included refining procedures, strengthening data-driven decision-making, and fostering collaboration across sectors to support the Scheme’s evolution.

We recognise that the success of the Scheme depends not only on regulatory oversight but also on the trust and participation of its users. CEMalta remains committed to nurturing that trust—by listening, adapting, and continuously improving. Our work is complex, but our mission is clear: to support Malta’s transition from a linear to a circular economy through a fair, transparent, and effective refund scheme.

On behalf of the Agency, I extend

sincere appreciation to our team, stakeholders, and service providers for their dedication and support. Their contributions have been instrumental in advancing the Scheme’s objectives and laying the groundwork for future success.

As we look ahead, our focus remains on securing the Scheme’s long-term sustainability and ensuring it continues to deliver tangible benefits to all who rely on it.



# Background

## The Regulator

Circular Economy Malta (CEMalta) is the national Regulator of the Beverage Container Refund Scheme, as established by Subsidiary Legislation (S.L) 549.134, hereinafter referred to as ‘the Regulations’.

The Regulations stipulate the obligations of the Licensed Operator and

relevant economic operators, which are enforceable by Law.

The role of the Agency is to exert its powers as an Authority to ascertain adherence to the legal requirements emanating from S.L 549.134.

## The Licensed Operator

BCRS Malta Ltd is the licensed operator of the national Beverage Container Refund Scheme, Malta’s very first Deposit Refund System (DRS). BCRS Malta Ltd was granted a license to operate the Scheme pursuant to the Environment Protection Act (Chapter 549) and the Regulations. The terms and conditions of the licensed operator are set out in a

Licence Agreement which was signed by the Directors of BCRS Malta Ltd, who represent Malta’s key players within the beverage industry, and the Government of Malta on the 14th of September 2020.

The Regulations and the Licence Agreement set ambitious Collection and Recycling targets which the Licensed Operator is bound to meet, as established in figure 01 below:

Reference Year	Collection Target	Recycling Target
2022	70%	65%
2023	70%	65%
2024	80%	75%
2025	85%	80%
2026 and for every calendar year thereafter	90%	85%

Fig.01 Licensed Operator's Collection & Recycling Targets of Single-Use Containers in Terms of Weight.

# Deposit Return Systems in the EU

Malta's Beverage Container Refund Scheme aligns with key EU directives, including the Single-use Plastic (SUP) Directive (Directive (EU) 2019/904) and the recently adopted Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR). This demonstrates Malta's commitment to reducing single-use plastics and increasing recycling rates.

The SUP Directive and the PPWR set a target of 90% separate collection for single-use plastic beverage bottles by 2029, along with requirements for increased recycled content in packaging, as specified in the relevant EU regulations. Malta's DRS aims to meet these targets by ensuring high collection rates for beverage containers through its mandatory deposit system, as outlined in figure 01 above.

The PPWR (EU) 2025/40, which takes effect in February 2025, underlines the significance of DRSs in achieving

ambitious EU packaging waste goals. It mandates that Member States implement DRSs for plastic and metal beverage containers and introduces recycling targets. Furthermore, the regulation emphasises waste prevention, aiming for a 5% reduction in packaging waste by 2030, 10% by 2035, and 15% by 2040.

Malta's DRS has already exceeded expectations, achieving collection rates of 85.7% for PET containers, 85.6% for aluminum cans, and 80% for glass bottles in 2024, either surpassing or meeting the set targets.

Through the Scheme, Malta has made significant strides in reducing litter, increasing collection and recycling rates, and aligning with EU environmental objectives outlined in the European Green Deal and the Circular Economy Action Plan. The successful implementation of a robust DRS highlights Malta's leadership in promoting sustainable practices.



# Advisory Board

In congruence with Section 8 of the Licence Agreement, the Advisory Board is made up of six (6) members; three (3) members represent the Agency, and three (3) members represent the Licensed Operator.

The Board reconvenes at least once a month, with the aim of reviewing certain technical aspects of the Scheme and addressing ensuing technical issues thereof.



# Scheme Registration

Regulation 36 (a) of S.L 549.134 requires that the Agency reports the number of economic operators participating in the beverage container refund scheme.

Figure 02 below displays the number of registered Scheme participants reported for 2024, categorised by their respective economic activities.

Category	QTY of Registered Economic Operators
Producers of beverages	13
Importers of beverages	218
Distributors of beverages	93
Retailers	1,836
Catering establishments	3,124
Event Organizer	17
Other Organizations	36
<b>Total</b>	<b>5,337</b>

Fig 02 - Registered Economic Operators as at 31/12/2024.

Regulation 13 also requires the registration of beverage container typologies by Producers and Importers who place beverage containers on the market. During the year under review, there were a total of 6,216 new product registrations with the Scheme, as per figure 03 below which is split by material.

Category	QTY of Beverage Containers
CAN	2,284
GLASS	1,339
PET	2,593
<b>Total</b>	<b>6,216</b>

Fig 03 - Beverage Containers Registered with the Scheme as at 31/12/2024.

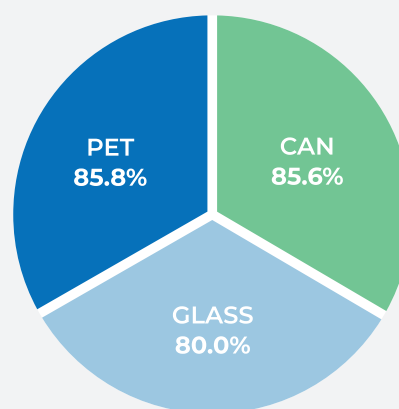


# Placement on the Market, Collection, and Recycling

As per Regulation 12 of the Regulations, BCRS Malta Ltd is responsible for submitting to the Agency quarterly data reports, including the placement against collection and recycling of single-use beverage containers, in aggregate by weight.

The placement, collection and recycling figures reported by BCRS Malta Ltd for year 2024 are detailed in Figures 04, 05, and 06 below:

Collection vs Placement (Tonnes) %



Material	Placement (QTY)	Placement (tonnes)	Collected (QTY)	Collected (tonnes)	Collection vs Placement (Tonnes) %
PET	174,831,643	5,193.02	148,228,393	4,454.41	85.8%
CAN	78,926,642	1,110.81	67,007,991	950.34	85.6%
GLASS	26,628,453	6,737.64	21,085,811	5,392.50	80.0%
<b>Total</b>	<b>280,386,738</b>	<b>13,041.47</b>	<b>236,322,195</b>	<b>10,796</b>	<b>82.8%</b>

Fig 04 - In Terms of Quantity and Weight by Material as at 31/12/2024.

Material	Placement (tonnes)	Exported (tonnes)	Rejects (tonnes)	Recycling Certificate (tonnes)	Adjusted Recycling (tonnes)	Placement vs Recycled (Tonnes) %
PET	5,193.02	4,565.87	111.46	4,552.58	4,441.44	85.5%
CAN	1,110.81	971.89	21.55	957.44	936.21	84.3%
GLASS	6,737.64	5,704.01	311.51	5,575.43	5,270.94	78.2%
<b>Total</b>	<b>13,041.47</b>	<b>3,747.25</b>	<b>148.17</b>	<b>11,085.45</b>	<b>3,549.53</b>	<b>82.6%</b>

Fig 05 - In Terms of Weight by Material as at 31/12/2024.

\*All rejects that were exported were recycled and form part of the consolidated recycled certificates.

\*\*Reject rate at recycler is equal for both in scope and reject containers.

\*\*\*Rejects exported by weight are the difference between exported and collected.

\*\*\*\*Recycling certificate adjusted to reflect the actual percentage of collected vs exported - Adjusted Recycling (tonne) = (Collected/Exported)\*Recycling Certificates.



As evidenced in the figures above, BCRS Malta Ltd successfully reported a collection rate of 82.8% for year 2024, which exceeded the ambitious target stipulated in the Regulations of 80 per cent (80%) in terms of the weight of single-use containers registered for year 2024.

Exercising its functions as the Scheme

Regulator, CEMalta in collaboration with the Licensed Operator looks forward to the year ahead to focus synergies on further bettering Scheme user-experience, benefitting both the consumers as well as ascertaining that the progressive targets established of the years ahead are met by the licensed operator.

# Infrastructure

The beverage container refund scheme incentivises customers to return their beverage containers to either Retailers offering manual collection, or one of the many Reverse Vending Machines (RVMs) installed across Malta and Gozo. The RVMs are equipped with the latest technology to scan each beverage container, to ensure that it is in scope of the Scheme and registered and generate a redeemable voucher to consumers.

A real-time map with the locations of the various RVMs spread across Malta and Gozo, showcasing the availability of the machines, is available on BCRS Malta Ltd's website. Beverage containers collected via the RVMs are then sent to BCRS Ltd's Clearing Site in Hal-Far for further processing and eventual export.

The figures below list the number and locations of RVMs of all machines that were active during 2024, including any movements in installations during the reference year.

QTY of RVMs per Category	
RETAIL	160
HOTELS	14
PUBLIC HUBS	137
JUMBO PUBLIC HUBS	41
<b>Total</b>	<b>352</b>

Fig 06 – Quantity of RVMs per category that were active during 2024.



## Public RVMs

Locality	Location / Street Name	RVM	RVM Type	QTY
Hal Far	Industrial Estate	A10069-Hal-Far Industrial Park	Optima + Ultra Glass	2
Hal Far	Industrial Estate	A10070-Hal-Far 2	Optima + Ultra Glass	2
Rabat, Malta	Triq L-Iskultura	A10071-Rabat Hub	Optima + Ultra Glass	4
Msida	L-Universita ta Malta	A10073-University of Malta	Flex Tri	1
Mqabba	Triw Hal-Kirkop	A10075-Mqabba Hub	Optima + Ultra Glass	2
Hal-Tarxien	Joseph Burlo	A10076-Tarxien Hub	Optima + Ultra Glass	2
Marsascala	Triq Iz-Zonqor	A10077-Marsaskala Hub	Optima + Ultra Glass	3
Kalkara	Triq Luigi Pisani	A10078-Kalkara Hub	Optima + Ultra Glass	2
Triq Giovanni	Gharghur	A10079-Gharghur Hub	Optima + Ultra Glass	2
Gafa	Triq Guze Cardona	A10080-Qormi Hub	Optima + Ultra Glass	2
Qormi	University of Malta, Tal-Qroqq	A10083-Welbee's Express Campus Hub	Optima + Ultra Glass	2
Msida	Triq Toni Zahra	A10086-Zejtun Hub	Optima + Ultra Glass	2
Zejtun	Triq villabate	A10087-Zabbar Hub	Optima + Ultra Glass	3
Zabbar	Triq Il-Wied	A10088-Qormi Hub 2	Optima + Ultra Glass	2
Qormi	Triq Dun Manwel Zammit	A10089-Siggiewi Hub	Optima + Ultra Glass	2
Siggiewi	Triq C.Bugeja	A10090-Dingli Hub	Optima + Ultra Glass	2
Dingli	Triq L-Ghenba	A10091-Attard Hub	Optima + Ultra Glass	2
Attad	Triq Ta Xlejli	A10094-Gudja Hub	Optima + Ultra Glass	2
Gudja	Triq Il-Ganfra	A10095-Mgarr Hub	Optima + Ultra Glass	3
Mgarr	Triq tat trunciera	A10096-Marsaxlokk Hub	Optima + Ultra Glass	3
Marsaxlokk	Triq tal Gardiel	A10097-Marsaskala San Tumas Hub	Optima + Ultra Glass	2
Wied il-Ghajn	Triw L-Isqof Caruana	A10100-Haz-Zebbug Hub	Optima + Ultra Glass	2
Zebbug	Telghet Ix Xemxija	A10101-Xemxija Hub	Optima + Ultra Glass + Ultra PET	4
Xemxijall-Gzira	Triq tas-Sliema	A10102-Gzira Hub	Optima + Ultra Glass	3
Swatar	Triq is-Swatar	A10103-Swatar Hub	Optima + Ultra Glass	2
L-Imnsida	Triq I-imrigg	A10104-Msida Hub	Optima + Ultra Glass	2
Sta Vennera	Cannon Road	A10105-St Venera Hub	Optima + Ultra Glass	2
Pieta	Triq Joe Gasan	A10106-Pieta Hub	Optima + Ultra Glass	3
St Pauls Bay	Mosta Road	A10107-St Paul's Bay Hub 1	Optima + Ultra Glass + Ultra PET	4
San Gwann	Triq il-qasab	A10108-San Gwann Hub	Optima + Ultra Glass	2
Paola	Triq Il-Knisja	A10109-Paola Hub	Optima + Ultra Glass	2
Zurrieq	Triq Il-Minthna Tal-Qaret	A10110-Zurrieq Hub	Optima + Ultra Glass	3
Birzebbugia	Triw San Patrizju	A10111-Birzebbuga Hub	Optima + Ultra Glass	2
Floriana	Triq Emvin Cremono	A10112-Floriana Hub 1	Optima + Ultra Glass	3
Floriana	Triq Emvin Cremono	A10113-Floriana Hub 2	Optima + Ultra Glass	3

Locality	Location / Street Name	RVM	RVM Type	QTY
Birkirkara	Tumas Fenech Street	A10114-Birkirkara Hub	Optima + Ultra Glass + Ultra PET	3
Sliema	Ix-Xatt Ta' Qui-Si-Sana	A10115-Qui Si Sana Hub	Optima + Ultra Glass + Ultra PET	4
Sliema	Tower Road	A10116-Sliema Hub	Optima + Ultra Glass + Ultra PET	2
Pembroke	Madre Margerita De Brincat	A10118-Pembroke Hub	Optima + Ultra Glass	4
St Pauls Bay	Dawret Il-Gzejjer	A10119-St Pauls Bay Hub 2	Optima + Ultra Glass + Ultra PET	4
Fgura	Triq il-Pitirros	A10120-Fgura Hub	Optima + Ultra Glass	2
Birgu	Xatt ir-Rizq	A10121-Vittoriosa Hub	Optima + Ultra Glass	3
Marsalforn	Triq tal-plejju	A10122-Marsalforn Hub	Optima + Ultra Glass	2
Gharb	Triq il-Vizitazzjoni	A10124-Gharb Hub	Optima + Ultra Glass	2
Luqa	Wied In-Noqor	A10130-Luqa Hub	Optima + Ultra Glass	2
Mtarfa	Triq L-Imtarfa	A10131-Mtarfa Hub	Flex Tri	1
Birgu	St Edward Street	A10133-Cospicua Hub	Optima + Ultra Glass	2
Ta Xbiex	Ta Xbiex Marina Parking	A10135-Ta Xbiex Hub	Optima + Ultra Glass	3
Birkirkara	Tunas Galea, Birkirkara	A10136-Ta Paris Hub	Optima + Ultra Glass	2
Naxxar	Triq V.Boron	A10137-Naxxar Hub	Optima + Ultra Glass	2
Marsa	Triq is-Salib tal-Marsa	A10138-Marsa Hub	Optima + Ultra Glass	2
Hal Far	Hal Far Industrial Estate	A10143-BCRS Educational Area	Flex Tri	1
Santa Lucija	Dawret it-Torri, Santa Lucija	A10144-St Lucija Hub	Optima + Ultra Glass	2
Hal Far	Hal Far Industrial Estate	A10145-Festival 1	Flex Tri	1
Hal Far	Hal Far Industrial Estate	A10146-Festival 2	Flex Tri	2
Valletta	St. Elmoplace	A10147-Valletta Hub	Optima + Ultra Glass	3
Senglea	Ir-Rampa ta' l-Isla	A10154-Senglea Hub	Flex Tri	2
Gozo	Triq ix-Xaghra	A10156-Xaghra Hub	Optima + Ultra Glass	2
<b>Total</b>				<b>137</b>

Fig 07 - Public RVMs that were active during 2024.

## Quantum - Public RVMs

Locality	Location / Street Name	RVM	RVM Type	QTY
Luxol	Triq Dun G.Farrugia	A10093-Luxol 2	Optima + Quantum + Ultra Can + Ultra Glass + Ultra PET	6
Mellieha	Tril Il Kbirra	A10098-Mellieha Hub	Optima + Quantum + Ultra Can + Ultra Glass	4
Ix-Xewkija	Triq il-qlugh	A10123-Xewkija Hub	Optima + Quantum + Ultra Glass	4
Marsa	Triq Giuseppe Garibaldi	A10148-Marsa Dep	Optima + Quantum + Ultra Can + Ultra Glass	5
San Gwann	Triq tal-Qattus Hal Far	A10149-San Gwann Depot	Optima + Quantum + Ultra Can + Ultra Glass	4
Hal Far	Industrial Estate	A10150-Quantum Hal-Far Depot	Optima + Quantum + Ultra Glass	3
Bulebel	Triq Id-Dejima	A10151-Bulebel Depot	Optima + Quantum + Ultra Can + Ultra Glass	5
Ta Qali	Ta Qali	A10152-Ta Qali Depot	Optima + Quantum + Ultra Can + Ultra Glass + Ultra PET	6
Kirkop	Triq id-9 t'April 1942	A10153-Kirkop Depot	Quantum + Ultra Can + Ultra Glass + Ultra PET	4
<b>Total</b>				<b>41</b>

Fig 08 – Quantum - Public RVMs that were active during 2024.

## Retail RVMs

Locality	Location / Street Name	RVM	RVM Type	QTY
Hamrun	5 Farrugia Building	A10002-Alfsons Enterprises Limited	Optima + Ultra Glass	2
Paola	115 Triq Haz-Zabbar	A10003-Antonio Piscopo Wines & Spirits	Optima + Ultra Glass + Ultra PET	3
Swieqi	141 Triq il-Qasam	A10004-Cornerfoodstore Co Ltd	Optima + Ultra Glass	2
Qormi	Triq Amleto Spiteri	A10005-Guido Vella Cash & Carry	Optima + Ultra Glass	2
Santa Venera	Old Railway Track	A10006-Welbee's St. Venera	Optima + Ultra Glass + Ultra PET	3
San Pawl il-Baħar	Triq l-Erba' Mwiezeb	A10007-Piscopos' Cash and Carry Ltd	Optima + Ultra Glass + Ultra PET	3
Balzan	Naxxar Road	A10008-Smart Supermarket Ltd.	Optima + Ultra Glass + Ultra PET	5
Naxxar	Parish Street	A10009-Welbee's Naxxar	Optima + Ultra Glass	2
Mellieħa	Triq il-Kbirra	A10010-Welbee's Supermarket Mellieħa	Optima + Ultra Glass	2
Hal Ġhaxaq	19 Triq Santa Tereza	A10011-Tal - Kawwar Cash & Carry	Optima + Ultra Glass	2
Mosta	Triq Valletta	A10012-PAMA Supermarket	Optima + Ultra Glass + Ultra PET	5

Locality	Location / Street Name	RVM	RVM Type	QTY
St. Julians	Pendergardens Triq Gort Paceville	A10013-Welbee's Paceville	Optima + Ultra Glass	2
St Julians	Portomaso, Church Street	A10014-Arkadia Foodstores Portomaso	Optima + Ultra Glass	2
Sliema	High Street	A10016-Welbee's Sliema	Optima + Ultra Glass	2
San Gwann	Vjal ir-Rihan	A10017-JK Supermarket Ltd	Flex Tri	1
Hal Tarxien	Triq Hal Luqa	A10018-Carters Supermarket	Optima + Ultra Glass	2
Zebbug	Mdina Road	A10020-daves food store - Zebbug	Flex Tri	1
St Paul Bay	Triq Censu Tanti	A10021-EuroSaver Supermarket	Optima + Ultra Glass	2
Marsaxlokk	Triq Iz Zejtun	A10023-Spar Marsaxlokk	Flex Tri	1
Swieqi	Triq is Swieqi	A10024-Lifestyle	Flex Tri	1
Hamrun	Daniel's Shopping Complex, 14 Triq il-Kbira	A10025-Interspar Hamrun	Flex Tri	2
B'Kara	The Brewery, Triq L-Imdina	A10026-Farsonsdirect	Optima + Ultra Glass	2
Hal Qormi	220 Triq San Edwardu	A10027-J.Sultana Beverages	Optima + Ultra Glass	2
Il-Hamrun	9 Dun F. Camilleri	A10028-Foodbox	Optima + Ultra Glass	2
Hal Qormi	Manuel Dimech Street	A10029-PAVI Supermarket	Optima + Ultra Glass + Ultra PET	4
Qormi	53 Triq il-Vitorja	A10030-Modern Store	Flex Tri	1
H'Attard	Victor Vassallo	A10031-G & G Supermarket	Flex Tri	1
Il-Mellieha	Triq Il-Marfa	A10032-Mellieha Holiday Centre	Flex Tri	1
Ir-Rabat	Triq Vincenzo Ciappara	A10033-Ta Karla Cash & Carry	Optima + Ultra Glass	2
Gzira	Triq Gianni Bencini	A10036-ORIENT MARKET 2	Flex Tri	1
Swieqi	Uqija Street, Ibragg	A10037-Greens Supermarket	Optima + Ultra Glass	2
/	/	A10038-Bottles & Bottles	Optima + Ultra Glass	2
Qormi	Triq L-Iljun	A10039-Lidl Malta Ltd	Optima + Ultra Glass + Ultra PET	5
Gozo	St George Fief Victoria	A10041-Ta Dirjanu Victoria	Optima + Ultra Glass	2
Gozo	Triq il-Kappuccini, Victoria	A10042-G&R Supermarket	Optima + Ultra Glass	2
Gozo	Antonio Mallia Str, Victoria	A10043-Wisto	Flex Tri	1
Gozo	The Duke Shopping Mall Republic Street, Victoria	A10044-Greens Supermarket Gozo	Flex Tri	1
Saint Julians	Spinola Park, Triq Mikiel Ang Borg	A10045-Welbee's Spinola	Optima + Ultra Glass	2
Zejtun	Tal-Barrani Road	A10046-Lidl Malta Ltd	Optima + Ultra Glass + Ultra PET	5
Tas-Sliema	Triq Amery	A10047-Lidl Malta Ltd	Optima + Ultra Glass + Ultra PET	3
Safi	Triq San Gwann	A10048-Lidl Malta Ltd	Optima + Ultra Glass + Ultra PET	5
Luqa	Triq il-Karmnu	A10049-Lidl Malta Ltd	Optima + Ultra Glass + Ultra PET	5

Locality	Location / Street Name	RVM	RVM Type	QTY
Il-Mosta	Triq id-Difiza Ċivili	A10050-Lidl Malta Ltd	Optima + Ultra Glass + Ultra PET	5
Mellieha	Triq Gorg Borg Olivier	A10051-C Vella & Sons Ltd	Flex Tri	1
St Pauls Bay	Triq Il-Merluzz	A10052-Welbee's Qawra	Optima + Ultra Glass	2
Victoria (Gozo)	Triq San Leonardu	A10053-Lidl Malta Ltd	Optima + Ultra Glass + Ultra PET	5
Nadur	Triq Sanblas	A10054-Joseph camilleri supplies	Optima + Ultra Glass	2
Fgura	Bastion Street	A10055-Chain Supermarket	Optima + Ultra Glass	2
Valletta	Old Bakery Street	A10056-gigis cash and carry	Flex Tri	1
Zebbug	Triq il-Qbajjar	A10057-Lighthouse Foodstore	Optima + Ultra Glass	2
San Pawl	Triq ix-Xitwa	A10058-SPAR BUGIBBA	Flex Tri	1
San Gwann	Triq Ic-Ciklamini	A10060-Lidl Malta Ltd	Optima + Ultra Glass + Ultra PET	4
Zejtun	Tal-Barrani Road	A10061-Discount Depot Cash & Carry, Zejtun	Optima + Ultra Glass	2
Santa Vener	Triq Misrah	A10062-Lidl Malta Ltd	Optima + Ultra Glass + Ultra PET	5
Zabbar	Triq Il Mina Ta Hompesch	A10063-Scotts Zabbar	Optima + Ultra Glass	2
Mgarr Road	Gozitano Agricultural Village	A10064-Vini e Capricci	Flex Tri	1
il-Mellieha	Marfa Road	A10065-DB Seabank	Optima + Ultra Glass	2
Saint Paul's Bay	Mosta Road	A10068-Gormina	Ultra Glass	1
Zabbar	Triq L-Inhasa	A10072-Chain Supermarket	Flex Tri	1
Mriehel	Triq L-Esportaturi	A10074-Greens Quad Limited	Optima + Ultra Glass + Ultra PET	4
Qawra	Dawret Il-Qawra	A10081-Iceland Qawra	Flex Tri	1
Burmarrad	Triq Burmarrad	A10125-Lidl Malta Ltd	Optima + Ultra Glass	4
Kalkara	Triq Il-Marina	A10126-Esplora Science Centre	Flex Tri	1
Ghajnsielem	Triq L-Imgarr	A10127-Ta Dirjanu Ghajnsielem	Optima + Ultra Glass	2
Swatar	Paul Borg Oliver Street	A10128-X Zone Discount Shop	Flex Tri	1
Zabbar	Triq Villabate	A10142-Ganza Extras	Flex Tri	1
Mosta	Triq id-Difiza Ċivili, Mosta, Malta	A10155-Eurospin Ltd	Optima + Ultra Glass + Ultra PET	4
Gozo	Portomaso Business Tower, Church St, St Julian's STJ 4011	A10158-Arkadia Foodstore Gozo	Flex Tri	2
St. Julian's	Mercury car park	A10159-Mercury Towers	Optima + Ultra Glass	2
<b>Total</b>				<b>160</b>

Fig 9 - Retail RVMs that were active during 2024.

## Hotel RVMs

Locality	Location / Street Name	RVM	RVM Type	QTY
St Pauls Bay	Dawret Il-Qawra	A10129-Seashells Resort	Optima + Ultra Glass	2
St.George's Bay	Eden Place	A10019-Intercontinental Hotel	Optima + Ultra Glass	2
St Julians	Vjal Portomaso	A10035-Hilton	Optima + Ultra Glass	2
Floriana	Great Siege Road	A10067-Excelsior Hotel	Optima + Ultra Glass	2
St. Julians	St George's Bay	A10015-Corinthia Hotel	Optima + Ultra Glass	2
St Julians	Dragonara Road	A10082-Westin Dragonara	Optima + Ultra Glass	2
Sliema	Gorg Borg Oliver Street	A10084-The Victoria Hotel	Optima + Ultra Glass	2
<b>Total</b>				<b>14</b>

Fig 10 - Hotel RVMs that were active during 2024.

It is worth mentioning that as a Government Agency and the national regulator, one of the main objectives of CEMalta is to ensure the accessibility of the Scheme to the public and to different societal groups. Considering this, during 2024 CEMalta engaged with various stakeholders, including the Licensed Operator and other Government entities concerned, and initiated discussions on the possibilities of increasing and maximising the accessibility of the machines to better serve consumers at

large, especially during peak periods such as the summer season. This may include relocation, redistribution, and/or increase in the number of machines. CEMalta aims to continue its vigilant work in this regard during the next year, in hopes of meeting and exceeding the public's demand, and for general continuous improvement.

Figure 12 below delineates the aggregate quantity of beverage containers by typology collected by the RVMs as at end of year 2024.

Material	RVM Collection (QTY)	RVM Collection (Tonnes)
PET	134,721,183	4,070.8
CAN	58,149,955	828.2
GLASS	13,312,663	3,259.9
<b>Total</b>	<b>206,183,801</b>	<b>8,158.9</b>

Fig 11 - Collection by RVMs that were active during 2024.

# Manual Collection

Regulation 18 (1) of S.L 549.134 stipulates that retail establishments shall have a system for the return of single-use containers. In the absence of an RVM per sub-regulation (1) of Regulation 16, Retailers are obliged to accept manual returns.

The data in Figure 13 above indicate an increase in manual collection among retailers compared to 2023, when 2,220.64 tonnes were collected.

Material	Manual Collection (QTY)	Manual Collection (Tonnes)
PET	13,507,210	382.3
CAN	8,858,036	122.1
GLASS	7,773,148	2,132.6
<b>Total</b>	<b>30,138,394</b>	<b>2,637.0</b>

Fig 12 – Manual Collection Figures in terms of QTY and Weight as at 31/12/2024.



# Exemptions

Refillable beverage containers represent a crucial pillar of Malta's circular economy framework. Designed for repeated reuse, these containers reduce the need for new packaging materials, minimise waste generation at source, and support sustainable production and consumption patterns. In contrast to single use containers, refillables contribute to resource efficiency by lowering energy and water consumption, reducing greenhouse gas emissions, and diverting waste away from landfills and incineration.

Under Part IV of Subsidiary Legislation 549.134, producers operating an established refillable system for the collection and reuse of beverage

containers within the scope of the Regulations may apply for exemption from participation in the national Beverage Container Refund Scheme (BCRS). Such exemptions, granted in accordance with Article 19, allow producers to operate their own Producer Deposit Return System.

To obtain an exemption, producers must register each refillable beverage container typology with the Agency. Registration ensures regulatory oversight of the refillable loop and confirms that the product meets the criteria for exemption. During 2024, three (3) new product typologies were registered as refillable as delineated in Figure 13.





Product Description	Barcode Number	Deposit Amount (€)
7 UP 25cl	5352201094285	€0.10
Britvic Bitter Lemon 25cl	5352201094247	€0.10
Britvic Ginger Ale 25cl	5352201094254	€0.10
Britvic Soda Water 25cl	5352201094261	€0.10
Britvic Tonic Water 25cl	5352201094278	€0.10
Budweiser 25cl	5352201001009	€0.10
Cisk 0.0 25cl	5352201092212	€0.10
Cisk Chill Berry 25cl	5352201091437	€0.10
Cisk Chill Lemon 25cl	5352201091406	€0.10
Cisk Chill Ginger Lime 25cl	5352201091468	€0.10
Cisk Excel 25cl	5352201090102	€0.10
Cisk Lager 25cl	5352201090508	€0.10
Cisk Lager 50cl	5352201000408	€0.17
Fontana 0.25L (Sparkling)	5352206176238	€0.13
Fontana 0.25L (Still)	5352206176221	€0.13
Fontana 0.75L (Sparkling)	5352206176214	€0.30

Product Description	Barcode Number	Deposit Amount (€)
Fontana 0.75L (Still)	5352206176207	€0.30
Hopleaf 25cl	5352201000217	€0.10
Hopleaf 50cl	5352201000385	€0.17
Lacto 25cl	5352201000231	€0.10
Mirinda 25cl	5352201093615	€0.10
Pepsi 25cl	5252201094308	€0.10
Pepsi Max 25cl	5352201003997	€0.10
Shandy 25cl	5352201001221	€0.10
Skol 50cl	5352201000415	€0.17
Levico 25cl (Still)	8020033000220	€0.10
Levico 25cl (Sparkling)	8020033000213	€0.10
Levico 50cl (Still)	8020033000138	€0.10
Levico 50cl (Sparkling)	8020033000121	€0.10
Levico 1L (Still)	8020033000060	€0.10
Levico 1L (Sparkling)	8020033000077	€0.10
Laurentana 1L (Still)	8004192103107	€0.10
Laurentana 1L (Sparkling)	8004192103305	€0.10
Café Cuba Still 0.75L	5352206176405	€0.30
Café Cuba Sparkling 0.75L	5352206176412	€0.30
O Water Still 0.75L	5352206176979	€0.30
O Water Sparkling 0.75L	5352206176986	€0.30
O Water Still 0.25L	5352206186992	€0.30
Water Sparkling 0.25L	5352206187005	€0.30
Vecchia Napoli Still 0.75L	5352206176429	€0.30
Vecchia Napoli Sparkling 0.75L	5352206176436	€0.30
Pepsi zero 25cl	5352201091147	€0.10
Kinnie 25cl	5352201094728	€0.10
Kinne Zero 25cl	5352201094742	€0.10

Fig 13 - Registered Refillable Beverage Containers as at 31/12/2024.

## ***Process Followed by Producers When Registering Refillable Containers***

Producers seeking exemption for refillable beverage containers must:

-  Submit an exemption request to Circular Economy Malta (CEMalta), including evidence of an established refillable system.
-  Register each product typology, providing details such as barcode, container material, capacity, and deposit amount.
-  Demonstrate the refillable loop, including:
  - othe method of collection;
  - otransport of returned containers;
  - ocleaning and sanitisation processes meeting food-grade standards;
  - orefilling and redistribution procedures.
-  Maintain a **Producer Deposit Return System**, whereby the deposit charged on each refillable container is fully refundable to consumers.

It should be noted that the deposit amount applied to refillable containers is determined by the operators themselves, not by the Scheme or the Agency.

## ***Retailer Process to Ensure Deposit Redemption***

For exempted refillable containers, retailers play a direct role in ensuring the smooth operation of the deposit refund system:

- Consumers pay a deposit upon purchase.
- After consumption, the empty refillable container is returned either to the point of purchase or to another return point designated by the producer.
- The retailer or designated return point refunds the deposit immediately.
- Containers are then collected by the producer, cleaned, sanitised, refilled, and redistributed.

This model embeds responsible consumer behaviour and ensures that refillable loops remain effective and transparent.



## Collection Targets for Registered Refillable Containers

The Regulations establish mandatory collection targets for refillable beverage containers. These targets are presented in Figure 14, below.

Reference Year	Collection Target of Refillable Containers in terms of weight
2022	70%
2023	70%
2024	80%
2025	85%
2026 and for every calendar year thereafter	90%

Fig 14 - Registered Producers of Refillables Collection Targets in Terms of Weight.

Regulation 22 of S.L 549.134 stipulates that Producers responsible for placing refillable containers on the market are bound to provide the Agency with quarterly data reports. These reports include the aggregate volume of refillable containers placed on and collected from the market by quantity and weight. Any additional information deemed necessary

by the Agency is also included in these submissions. This information shall be submitted to the Agency on a quarterly basis.

Figure 15 below showcases the total collated aggregate quantity by typology of refillable beverage containers placed on the market by registered producers and collected for reuse.

### **Containers placed on the market and the quantity of refillable containers collected for reuse by such producers and the position of their deposit refund account**

Placement (KGS)	Collection (KGS)	Collection Rate (%)	Refillables Bottles Deposit Balance (€)
3,790,055	3,596,338	94.9	€109,463.06

Fig 15 - Refillable Beverage Containers Placement and Collection, and Refillable Bottles Deposit Balance as at 31/12/2024.

Notably, the collated collection rate of registered producers of refillable beverage containers exceeded the collection target of 84% for the year 2024. This collection rate

reiterates the effectiveness of refillable systems, in adherence with the philosophy of a circular economy.

# Complaints

CEMalta is herewith providing the number of queries and complaints received during the year 2024, as required by Regulation 36 of S.L 549.134.

As the national regulator of the Scheme, CEMalta has carefully taken on the responsibility of looking into, responding to, and following up on inquiries and complaints throughout the year under review.

As an ISO9001:2015 certified organisation, CEMalta is dedicated to recording complaints to ensure transparency, accuracy, and accountability. The Agency upholds responsiveness and efficiency as key values in its operations. CEMalta thus strives to acknowledge complaints within 48 hours and provide timely feedback

to address arising issues, ensuring stakeholder satisfaction with the services provided. In 2024, CEMalta continued to carry out its regulatory vigilance as outlined in Figure 17, which provides details pertaining to the queries and complaints received.

CEMalta confirms that all reported cases were thoroughly investigated, and appropriate actions were taken. Where possible, CEMalta offered guidance to help economic operators comply with the relevant S.L.

For complaints and queries that fell under the jurisdiction of the Licensed Operator, CEMalta facilitated communication between complainants and BCRS Malta Ltd, ensuring effective and efficient resolution.



Nature of Query/Complaint	QTY
Products not Registered with the Scheme	18
Erroneous Charging of Deposit by Catering Undertakings for Dine-In	10
Erroneous Charging of Deposit on Products	14
Redemption of Vouchers by Retailers	27
Issues relating to Reverse Vending Machines	24
Operational issues with BCRS Malta Ltd	40
Manual Collection by Retailers	13
*Other	22
<b>Total Queries and Complaints</b>	<b>168</b>

Fig. 16 - Queries and Complaints by Category as at 31/12/2024.

\*Queries and complaints categorized as ‘Other’ primarily pertain to issues that do not fall within the Agency’s scope of responsibility. Instead, these matters typically fall under the remit of other government entities, making them outside the Agency’s remit.

Queries and complaints categorised as ‘Operational Issues with BCRS’ include logistical inefficiencies, such as delays in manual collection, inconsistent communication between Economic Operators and the Licensed Operator, and others.



# Investigations

The Agency’s compliance arm ensures that the legal obligations emanating from S.L 549.134 are adhered to. In this regard, the Agency is legally obliged to ascertain that the Scheme’s Licensed Operator and other Economic Operators essentially observe S.L 549.134.

In 2024, the Agency took a pre-emptive and preventive approach to mitigate potential legal shortcomings which may

have adversely affected the Scheme. Such actions included gathering and in-depth analysis of information and data, meetings and audits with relevant economic operators, random checks, mystery shopping, and inspections.

Figure 18 below provides an overview of the investigative actions carried out by the Agency during 2024.

Meetings with Economic Operators	Mystery Shopping Exercises	Inspections	Audits
11	27	296	3

Fig. 17 - Compliance Actions undertaken by the Agency as at 31/12/2024..

During 2024, the Agency investigated Producers vis-a-vis their legal obligation of reporting of placement on the market with the Licensed Operator, as is required

under Regulation 14 of S.L 549.134.

Figure 19 below showcases the number of cases resolved during the year under review.



Status of Investigation	QTY
Opened in 2023 / Resolved in 2024	7
Opened in 2024 / Resolved in 2024	7
<b>Total Resolved in 2024</b>	<b>14</b>

Fig 18 – Investigations vis-a-vis Economic Operators' Placement on the Market as at 31/12/2024 .

CEMalta played a pivotal role in facilitating communication between the Producers and the Licensed Operator, ensuring that any dues to the Scheme were effectively reconciled.

# Financial Position of the Scheme and of the Deposit Refund Account of the Licensed Operator

S.L 549.134 stipulates that BCRS Malta Ltd shall provide the Agency with the Financial Position of the Scheme and of the Deposit Refund Account.

To this end, CEMalta is hereby reproducing figure 19 below. It is

pertinent to note that figures provided were presented to BCRS Malta Ltd by RSM Malta, an independent third-party registered auditor, and are being reproduced by the Agency as part of this Annual Report.

	Deposits for beverage container account - (included in Note 20 to the financial statements)	Collections/ payments traced in the bank account	Outstanding balance as at 31/12/2024	Remarks
	€	€	€	
Beginning Balance	(2,435,202.28)	3,867,076.45	1,431,876.17	With €80.72 difference noted between AUP Report and Audited balance in 2023.
Deposits receivable from producers and importers on beverage containers placed on the market	(28,055,718.60)			
Deposits receivable from retailers, distributors, caterers, and HoReCa from stock self-declaration form from the reconciliation between CE Malta and BCRS	(144,619.92)	24,972,907.81	(3,227,430.71)	Note C
Deposits payable on redeemed beverage containers (including both through redeemed vouchers & manual collections)	23,101,749.50	(22,516,952.70)	584,796.80	Includes bank charges totalling to €3,239.36.
Unredeemed vouchers and deposit	5,230,241.60	(5,745,950.00)	(515,708.40)	The unredeemed vouchers pertain to expired vouchers not redeemed within 1 year. While the unredeemed deposits pertain to the 20% of 2023 unredeemed deposits and 80% of 2024 unredeemed deposits. Unredeemed deposits are computed as placements minus collections of beverage containers. This is in line with the Company's policy.  In the collections column, the amount of €5,745,950, is net off additional funds transferred from disposal of the held for trading investment amounting to €34,050.  Refer to Note D
Redeemed vouchers forfeited to charity organisations	122,566.50	(28,323.10)	94,243.40	
	(2,180,983.20)	548,760.46	(1,632,222.72)	
Amount as per audited Financial statements	(2,181,065.00)			
Amount as per bank statement		548,758.13		
Variance	81.80	2.33		
	Note A	Note B		

**Note A**

It was noted that the deposits receivable from producers and importers on beverage containers placed on the market during 2022 and 2023, as accounted for in the books, amounted to €29,396,181.40 instead of €29,396,261.80. This variance relating to 2023, has remained unchanged, and has been carried forward to 2024. In addition, an immaterial variance of €1.40 is attributable to rounding differences arising in the year 2024.

**Note B**

Pertaining to variance noted in 2022.

**Note C**

The total amount of deposits receivable originating from the stock-declaration forms included in the 2023 report amounted to €671,338.68 and an additional amount of €144,619.92 was included 2024 report, resulting to a total of €815,958.60

**Note D**

The total unredeemed deposits reported in 2023 amounted to €6,063,856, and in 2024, it amounted to €4,823,485.35. The total actual bank transferred made from the deposit bank account to the operational bank accounts were €2,388,061.90 in 2023 and €5,745,950 in 2024. Hence, the Company has a net balance of €2,753,329.40 that still needs to be transferred from the deposit bank account to the operational bank account.

*Fig 19 – Agreed Upon procedures – Operation of the Deposit Refund Account of BCRS Malta Ltd.*



1.5L/50.7 FL OZ  
24 25-20

STILL WATER

# CIRCULAR ECONOMY MALTA

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