



*Report on the Calculation of the Return
Point Handling Fee for Scotland's DRS*
Updated report issued to industry

November 2022

Original Report released in
June 2022

Legislative Context

PwC were engaged to assist with the collection and analysis of data to support CSL's determination of the handling fees

DRS Context

- Under the terms of “The Deposit and Return Scheme for Scotland Regulations 2020” legislation, the Scottish Government has mandated the establishment of a Deposit Return Scheme (DRS) for single-use drinks containers in Scotland
- The scheme will be the first of its kind in the UK, however the remaining nations are expected to implement similar schemes in the coming years
- Circularity Scotland (CSL) has been appointed by the Scottish Government as the administrator of the scheme to be established
- As part of the scheme, various operators will be required to operate return points, accepting in-scheme containers from consumers and refunding associated deposits
- The scheme administrator will provide a reasonable handling fee, on a per container basis, to the return point operator (RPO) to take into account costs associated with collecting containers
- The scheme requires all beverage sellers (with some voluntary exclusions) to participate in the scheme, including: physical retailers, hospitality and distance sellers

**Announced in
2017**

**Covers Glass,
PET, Metal**

**Target return
rate of 90%**

**Launching in
2023**

**The latest of
46 existing
schemes
globally**

Calculation Methodology

PwC were engaged to assist with the collection and analysis of data to support CSL's determination of the handling fees

RHF Context

- Appropriate compensation for return point operators, via a set of retail handling fees, is one of the most important elements of scheme design
- Scottish legislation has outlined a set of principles which must be met by the resulting RHF, however a detailed exercise to establish base costs is required
- This set of RHF will initially be based on a combination of assumptions and actual data, and updated after a period of time once operational data is available (e.g. relating to return volumes and costs)
- A starting point of separate fees for the differing RPO types (Manual, Automated, Closed-loop Hospitality, Takeback) was provided by CSL, as determined by the regulations
- To support the development of the DRS, CSL engaged PwC to deliver a project to assist in building an evidence base to help them determine a suitable set of RHF

PwC's scope of work was to support with the collection of data and insights but not to recommend fees or fee structures

What PwC have done

- The project has provided an evidence base for CSL to determine a set of RHF's, via a cost model that approximates the costs which may be incurred by RPOs participating in the scheme
- To develop this cost model, PwC engaged with a wide variety of stakeholders, gathered data from a range of sources, and carried out extensive research into other schemes around the world
- The cost model created reflects the DRS regulations and CSL's guidance on how to interpret the legislation
- The model provides flexibility for future modification of these assumptions
- Additionally, the model was designed to reflect the variation in cost drivers across RPO types, RPO locations, packaging materials and operating models

What PwC have not done

- PwC have not made a recommendation on possible values for the RHF's or fee structures, instead providing a cost model based on a set of cost drivers agreed with CSL, then populated with both industry sourced and PwC gathered data
- PwC have not made an explicit recommendation regarding the setting of differentiated RHF's, but their work has outlined differences in cost parameters between variables (e.g. material type, RP article volume) such that the CSL Board can make a judgement on the number and type of RHF's to set
- The cost-model is designed to include / exclude a variety of cost items, based on the DRS legislation. The provided model structure / configuration should not be interpreted as PwC's recommendation on cost-item coverage

As the primary output, development of the RPO cost model was split into three distinct phases

Process Overview	
1	Define provisional principles and resulting input requirements for a cost model to meet system objectives
2	Create a meaningful, robust and targeted set of international DRS benchmarks to inform an “Outside-in” view on RHF, as well as an understanding of scheme design and operational principles
3	Collate and validate the necessary input data for the model from different types of RPOs and other relevant sources (e.g. RVM manufacturers, third party data) through a wide-reaching data request , as well as incorporating this with data provided by CSL



Core Output
<ul style="list-style-type: none">• A flexible cost model to capture all cost components that may be included within the RHF under the DRS regulations• Reflecting the variation in cost drivers across RPOs, packaging materials and operating models• Model implications, per RPO type, of setting the RHF at different levels (e.g. total gain / loss for assumed volumes)
<p>Purpose: Provide a data-driven evidence base for CSL to draw upon in their RHF definition and design, which can be used on an ongoing basis as operational data becomes available.</p>

Throughout the process, input was sought from a broad range of stakeholders and sources

Broad insight and data from a range of different sources and stakeholders

Site visits to a broad range of return point operators

Input from CSL stakeholders and other scheme participants

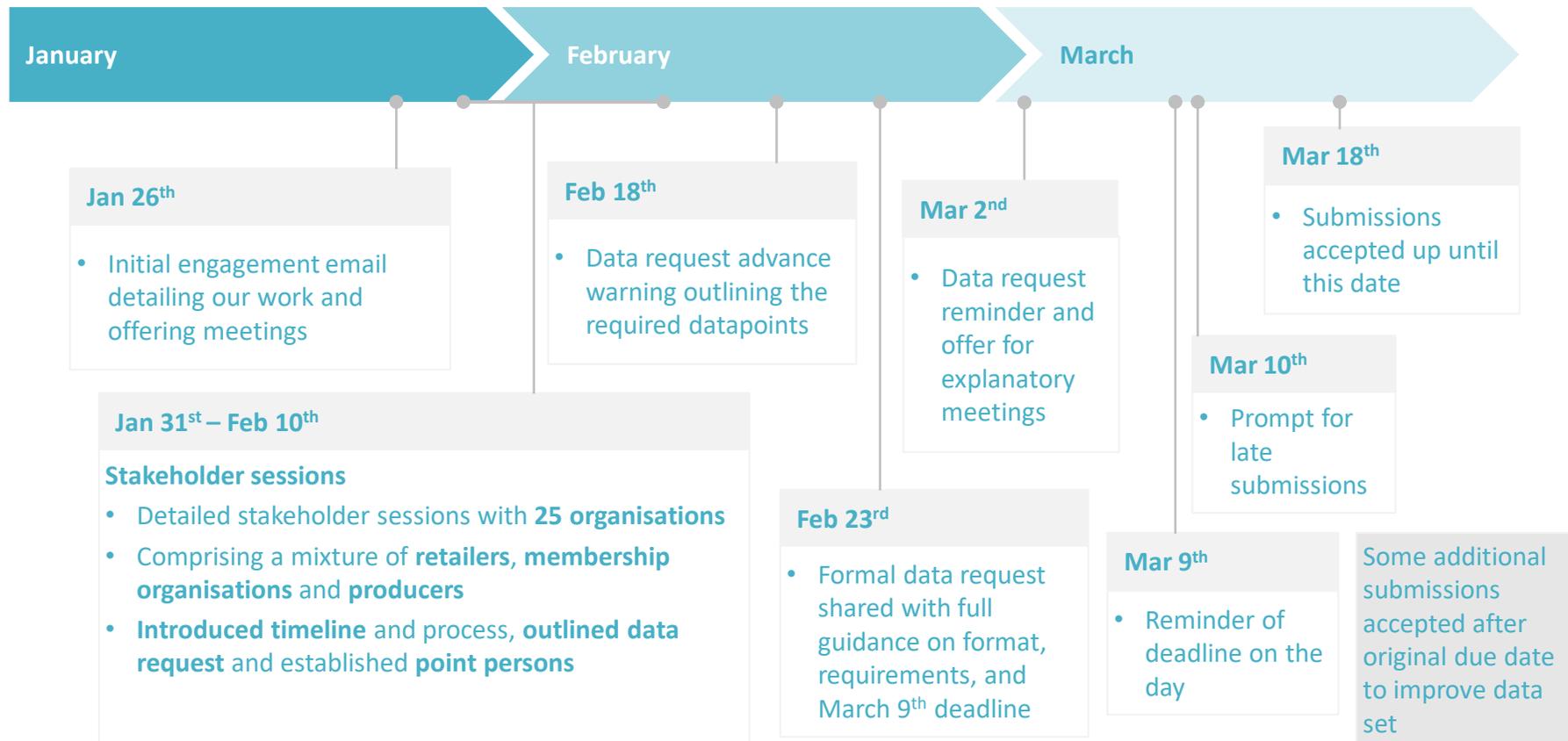
Consultations with experts across the Scottish retail industry

Insight into and feedback from similar international DRS schemes

CSL and legislation specifications

Consultations and input from key suppliers, such as RVM manufacturers

Stakeholders from across industry were engaged throughout the project, with expectations clearly communicated



A cost model for approximating RPO costs was developed to help inform CSL's RHF definition

The cost model aims to approximate fees incurred by RPOs of different types, sizes and locations...

- In order to provide suitable evidence to help inform CSL's RHF definition, a cost model for modelling possible costs incurred by RPOs as a result of operating a return point
- The model was built using a variety of input sources¹
- The model accommodates factors such as:
 - RPO type (e.g. Hospitality, automated retail)
 - RPO location (e.g. rural vs urban)
 - Return volumes
 - Material splits

... considering a core set of 6 cost areas, with flexibility for future modifications built-in

Cost areas	
Storage space for bag/totes	Costs incurred by space used for storing returned empty containers
Space for RVM	Costs incurred by space used in the operation of an RVM
Staff time cost	Cost of the time taken by staff carrying out RPO activities
RVM purchase & operational costs	Cost of up-front purchase and ongoing charges relating to RVMs
Materials for storage and collection	Cost of consumables required for operating an RPO
Transportation	Cost incurred by online-operators offering a takeback service ²

Not all cost items apply to all RPOs, and each is underpinned by a variety of sub-costs, with the model allowing flexibility for inclusion / exclusion of these

Cost inclusion differs by RPO type, to reflect variation in incremental costs incurred via return point operation

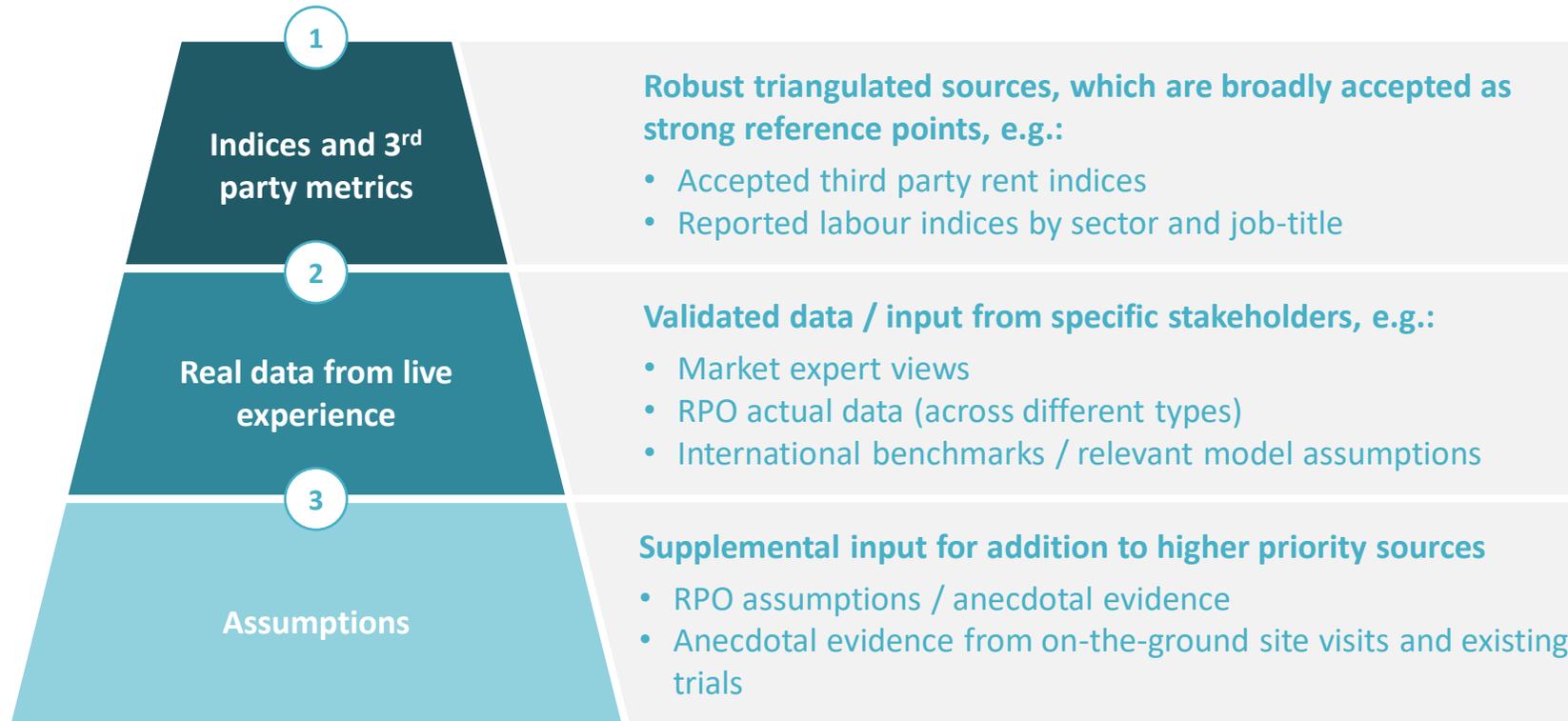
Cost area inclusion per RHF

	Automatic	Manual	Open-loop Hospitality	Closed-loop Hospitality	Takeback
Storage space for bag/totes	Included	Included	Included	Excluded	Included
Space for RVM	Included	Excluded	Excluded	Excluded	Excluded
Staff time cost	Included	Included	Included	Excluded	Included
RVM purchase & operational costs	Included	Excluded	Excluded	Excluded	Excluded
Materials for storage and collection	Included	Included	Included	Included	Included
Transportation	Excluded	Excluded	Excluded	Excluded	Included

Key: ■ = Included ■ = Excluded

A clear method was defined to develop appropriate inputs for the cost model

Evidence classification, and resulting prioritisation, was carried out using a three-tiered approach, to ensure that model inputs were grounded in validated and highly-relevant data

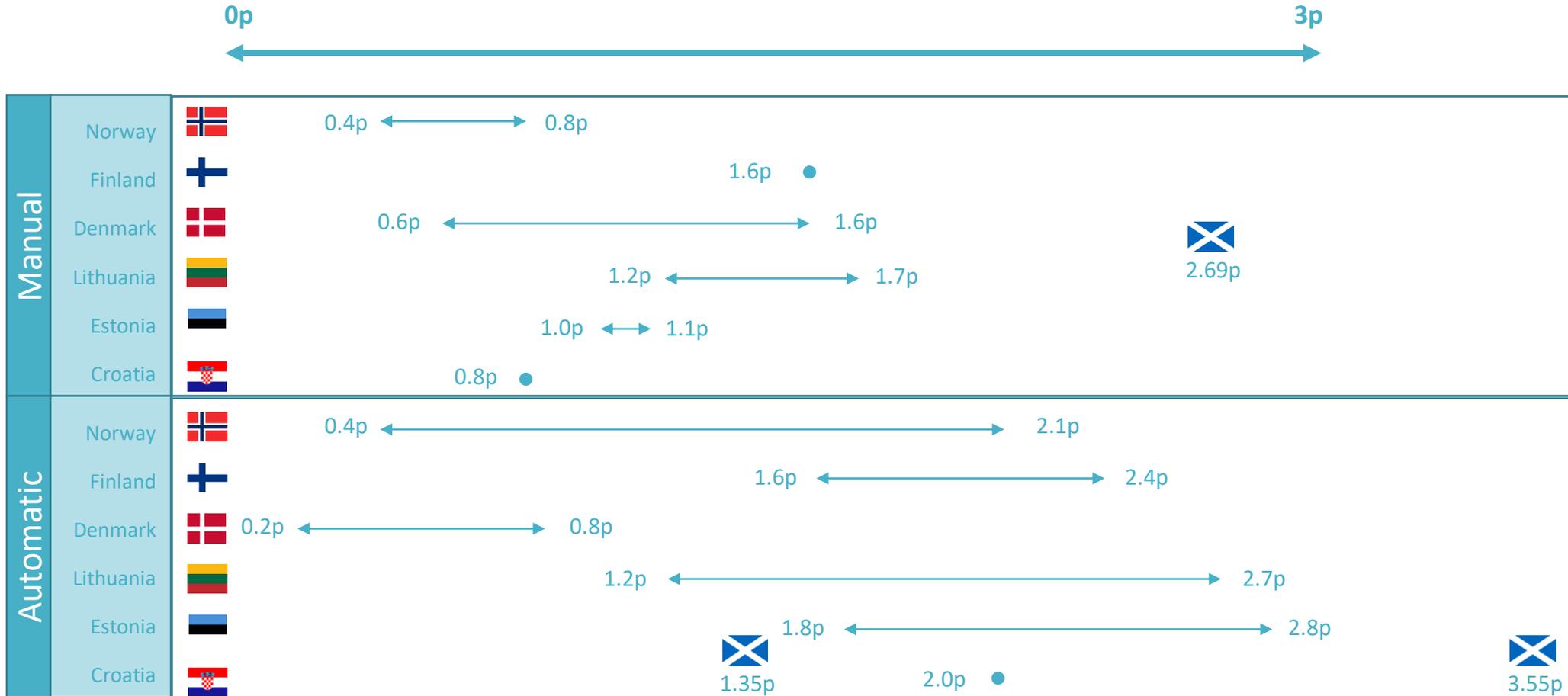


Results

The RHF's for the first year of operation of the scheme are as follows

Type of RHF	Fee/returned scheme article
Manual	2.69p
Automatic (for those RPs utilising an RVM that complies with the CSL RVM specification)	3.55p for the first 8,000 containers received in each week by the RP 1.35p for each additional container received in each week by the RP
Closed loop hospitality	0.13p
Takeback	To be released at a later date, pending finalisation of operating model

Comparison of Scotland's RHF with those of other schemes



Frequently asked Questions

Frequently Asked Questions

Responses to a range of questions asked of the board are in the document embedded below.



**Microsoft Word
Document**

Concluding Remarks

Addendum information shared in November 2022

Summary

RHF Report Addendum – Introduction

- Most people who have been involved with DRS from the initial industry engagement 3 or more years ago will be aware of the tensions that exist in all DRS schemes across the world associated with the calculation of the return point handling fees (RHF). It was for this reason that the founding members of CSL decided to encapsulate within the company's constitutional documents the decision to appoint an independent and external body to determine the RHF. The board of CSL set out to achieve that objective through a procurement process last year, involving a range of different types of consultancies experienced in elements of such an assignment.
- As a consequence of the board being unable to identify a suitable party willing to take on the assignment as defined, it was agreed by a vote of the members that PwC be appointed to provide the board of CSL with details and analysis to enable the board to determine the appropriate level at which to set the RHF's for year 1 of the scheme's operation. This exercise was professionally and diligently performed, and the resulting RHF's were released in June 2022.
- There has been widespread support for and agreement with the outcome, and there have also been many expressions of concern about the resulting values. In many ways, this spectrum of responses is, in my view, indicative of a largely acceptable result! Some organisations have submitted additional data to support their concerns – the data submitted has been compatible with the data used in the model.
- With a little more than 10 months to go until go live, all parties involved in delivering their part of DRS should be focused on implementation. But it is clear to the board that the ongoing debate about the RHF calculation is disrupting that focus and adding extra time and cost to what is already a challenging timeline. Given the confidence the board has in the process and outcome used to develop the RHF, we have decided to provide more detail on the data sourcing and selection process, and the calculation methods adopted, to arrive at the issued fees. We expect that this addendum should quell the concerns raised, demonstrate the rigour applied and the equitable nature of the approach taken, and allow all parties to prepare for the challenges in 2023.

Craig Anderson (Chair)

Introduction

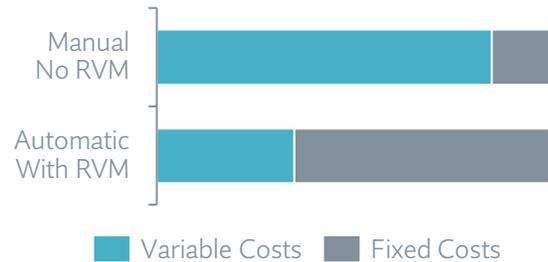
- The original report issued on 6 June 2022 set out:
 - The parameters of the RHF calculation process
 - The phasing, timeline and principles of the exercise undertaken by CSL and our independent consultant
 - The areas of costs included, and the ranges of those costs assessed across a number of variables (e.g. RPO type, RPO location, return volumes, material mix)
 - The process for evidence prioritisation and segmentation
- This addendum provides further detail on the approach and principles the CSL board applied in determining the RHF, and the selection of data used in the calculations. The assumptions derived from these principles were, at a high level, used to translate the cost data gathered into the first year RHF values

Any scheme must make choices to attain effectiveness and fairness: notable for the RHF is the impact of volume on return point costs...

Cost per container varies significantly with return point size due to the fixed costs of an RVM

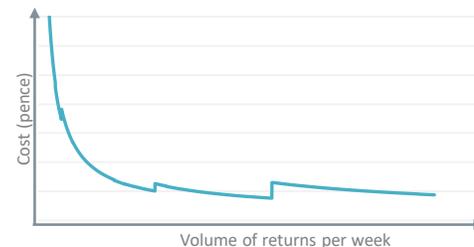
RVMs have more fixed costs

- Using an RVM to process returns leads to a significantly higher proportion of the cost per returned unit being fixed



Meaning cost per unit falls as volume increases

- Higher volume RVM sites will typically have a lower cost per container than a manual site
- As return volumes increase for a given RVM site the cost per returned unit decreases, as fixed costs are spread across a larger number of returns



The tension this creates must be addressed with 'reasonable' judgements

- What is a reasonable threshold for exemption from acting as a Return Point?
- What is a reasonable Manual vs Automatic threshold for containers per week?
- Should the Automatic RHF be 'stepped' to address better economics per unit at higher volumes?
- How do these impacts vary across site types, sizes and pack mixes?

... and fluctuations in costs across different return points

A DRS scheme faces inherent challenges due to the varying nature and scale of return points in the scheme

Which costs are covered by the DRS?

- A wide range of cost items could expect to be compensated by the DRS, both those in the table related to operating a return point, in addition to others
- The legislation determines which costs are included

Cost Examples	Automatic	Manual
Storage space for bag/totes	Included	Included
Space for RVM	Included	Excluded
Staff time cost	Included	Included
RVM purchase & operational costs	Included	Excluded
Materials for storage and collection	Included	Included
Transportation	Excluded	Excluded

Key: ■ = Included ■ = Excluded

What value should be used?

- For each individual return point, the value of the cost will be slightly different
- It will be influenced by factors such as location, store processes, labour rates and the mix of packs received
- Each day there are as many different handling costs as there are return points



The tension this creates must be addressed with 'reasonable' judgements

- Key tensions:
 - How many different RHF's should there be?
 - For a given group, should costs be covered for 100% of sites (meaning over-compensation for most), or the average site, or something else?

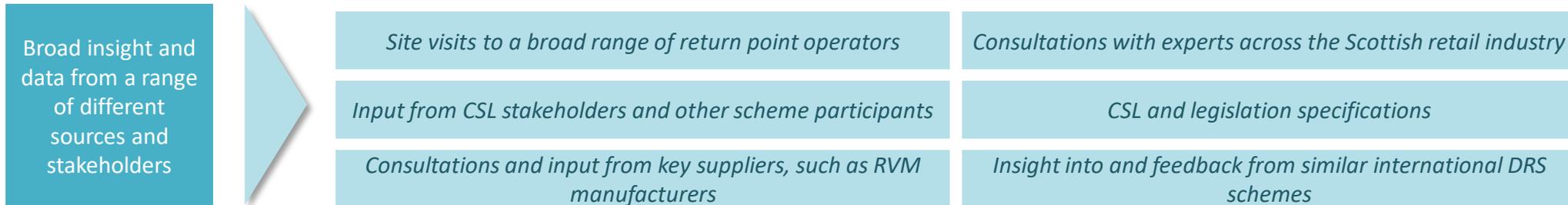
CSL made the following judgements to balance effectiveness and fairness

	Judgement to make	CSL decision	CSL rationale
Exemption volume	The volume of returns at which manual sites are assumed to be excluded from the scheme (e.g. likely to be exempt or direct volumes to a larger site)	500 units per week	<ul style="list-style-type: none"> The fee was set for a period more than a year in advance – assumptions were made about the take-up of exemptions and the level of opt-out
Manual vs Automatic volume	The volume of returns at which it is reasonable for CSL to compensate a site for an RVM	5000 units per week	<ul style="list-style-type: none"> It is clear that it is unreasonable for an RVM to be used where weekly collections are 1 – and equally unreasonable to use a manual approach for 100k. There is therefore a returns volume threshold where it reasonable to move from manual to RVM. Based on reference to the cost curves and to other schemes, the Board judged that, on average, 5k units per week, is a reasonable threshold level
Automatic stepped fee	Whether the automatic fee should be stepped in order to reflect significant variation in cost over recovery along the curve, and result in tiers of Automatic fees	Stepped fee 2 Automatic RHF tiers	<ul style="list-style-type: none"> Auto 1 and Auto 2 with threshold at 5000 and 8000 returns per week respectively Selection of these points were driven by the profile of the cost curves developed
Automatic fee over compensation	Should the highest volume RHF be weighted downward to reflect over compensation from a stepped Automatic fee?	Auto 2 RHF adjusted down	<ul style="list-style-type: none"> The point selected on the cost curve to set the automatic fee still has a material element of fixed cost recovery. This is what typically leads to over-recovery of costs at higher volumes. Hence the decision to compensate for that over-recovery by adjusting the Auto 2 RHF down, and so avoid unfair profits from the fee.
Cost coverage: Average vs 100%	Whether sites be compensated for the highest cost site within this range, or for an average position within this range	Manual - average Auto 1 - 100% Auto 2 - average	<ul style="list-style-type: none"> By setting it to 100% many RPs make a profit. For Manual and Auto 2 modelling showed that using an average meant that deviation from breakeven was low, and compensated for by other factors (such as actual spend being less than modelled spend). Auto 1 was set to 100% given it occupies a small band of returns (5000-8000)
Costs Included	Which costs would be covered by the RHF out of the costs incurred as part of DRS	As determined by legislation	<ul style="list-style-type: none"> Within the boundaries defined by legislation a broad set of individual parameters were included. A measure of reasonableness must be applied to ensure costs are only included which are reasonable, proportionate and necessary for the RP to comply with the regulations. Costs which are discretionary in nature or disproportionate have not been included.
Defining an 'average site'	As costs vary by location and packaging material, what values are used to model an average site	Weighted average of data inputs	<ul style="list-style-type: none"> A weighted average approach was used to develop the small number of actual data values used in the modelling. This is based both on what almost all other DRS schemes do and on the comparative modelling which showed that the impact on profit/loss was low
Evidence hierarchy	Prioritisation of data sources, for example data from existing international schemes compared to estimations from retailers e.g. handling time	Refer to evidence hierarchy	<ul style="list-style-type: none"> The fees are set to cover the first full year of operation – at the end of which there will be high volumes of actual data, and high levels of skill/experience in operating RPs. In the absence of such solid practice-based data, similar data points were obtained from schemes with scale experience of operating similar types of RPs.

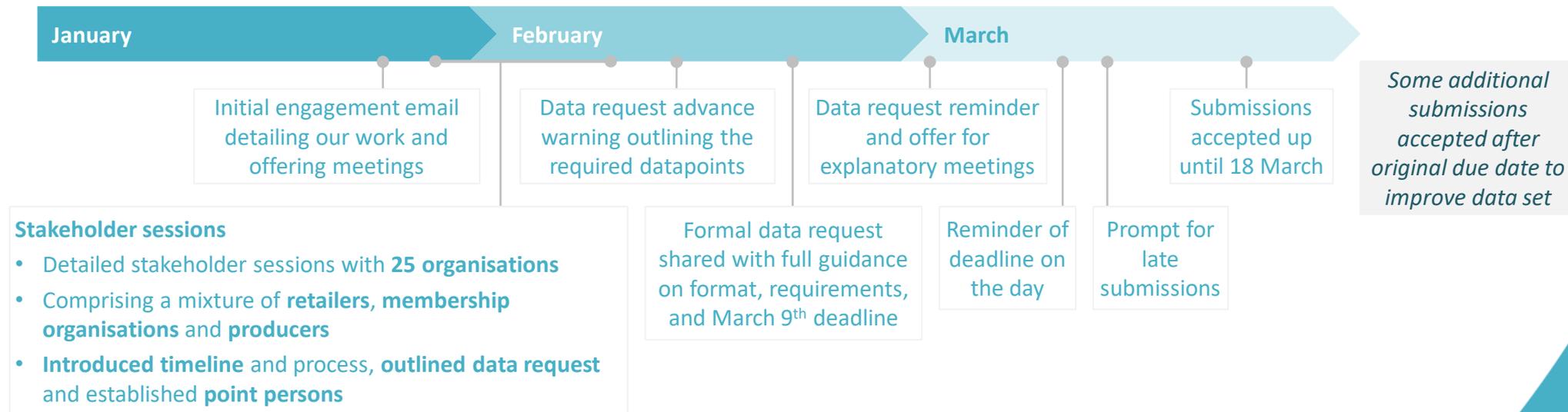
There is limited legislative determination in respect of these tensions except for deciding which costs to include

All retailers or their membership organisations were given multiple opportunities to understand the process, provide data and ask questions

Stakeholder Input

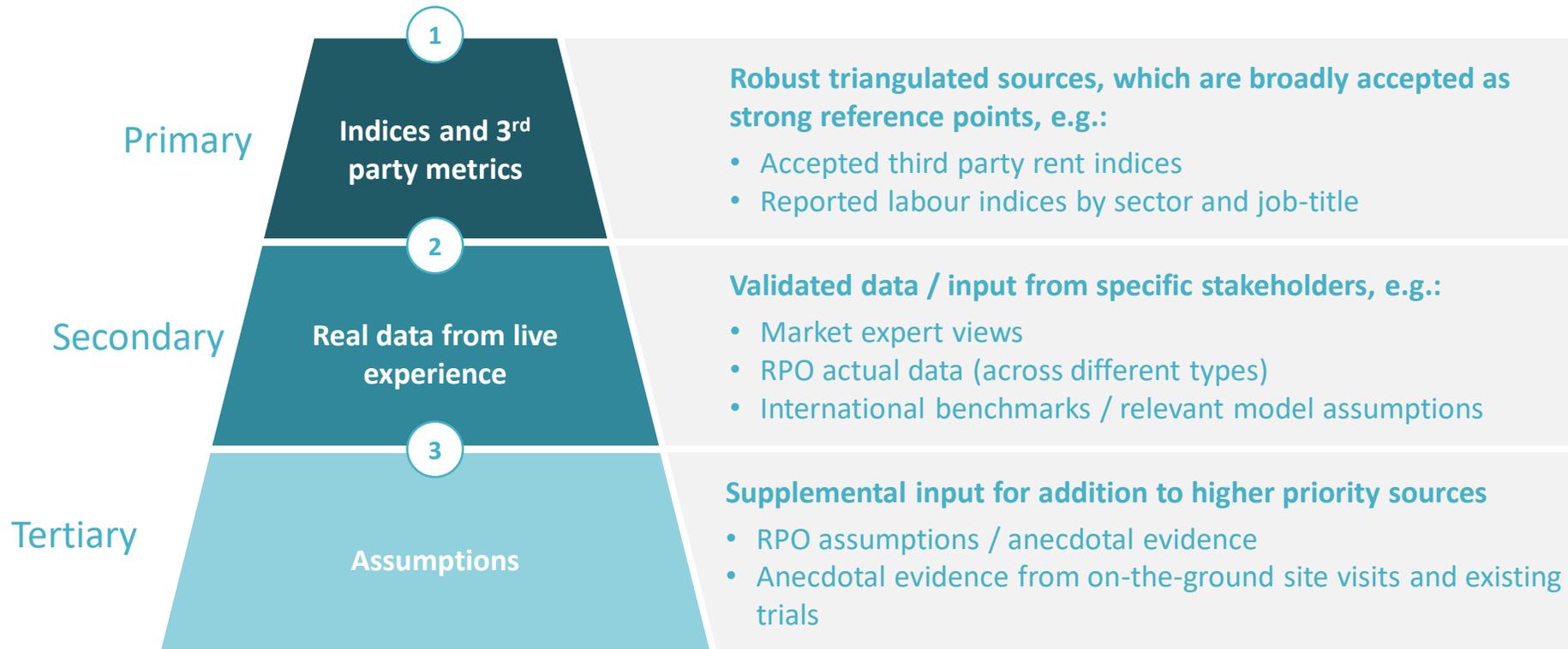


Stakeholder Engagement Timeline



Data inputs were prioritised using a consistent hierarchy

Evidence classification, and resulting prioritisation, was carried out using a three-tiered approach, to ensure that model inputs were grounded in validated and highly-relevant data



Evaluation and Ranking of Data Sources

A 3 stage data validation/relevance hierarchy

Source actual timing/usage data from well established schemes

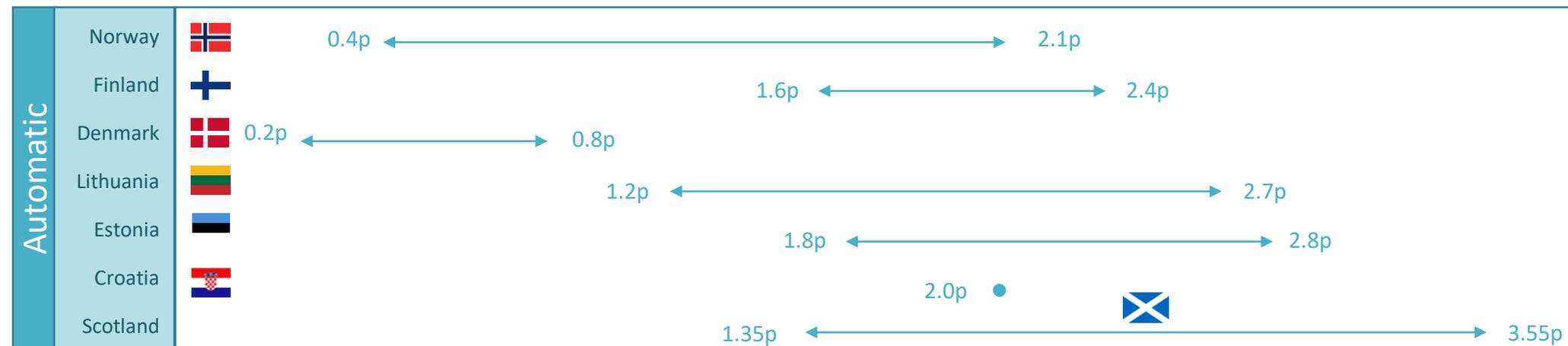
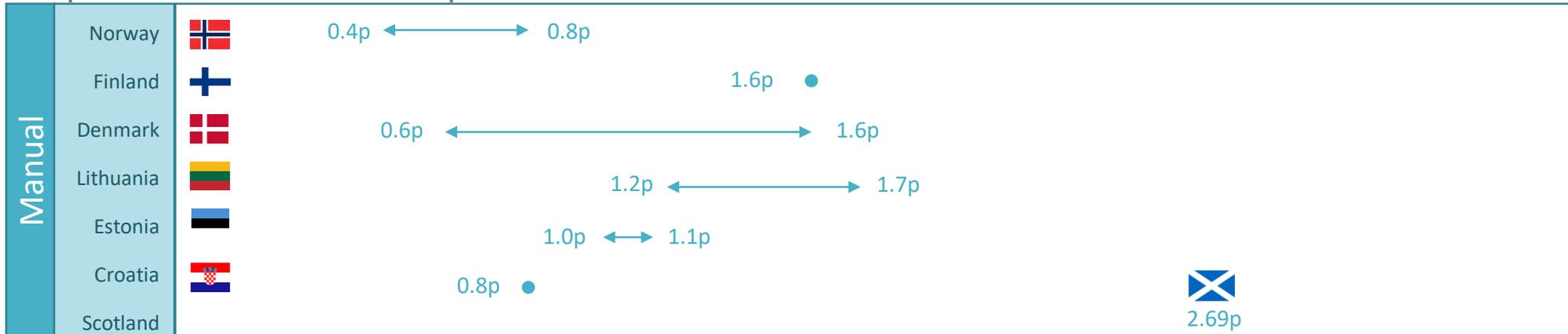
Aligned to the regulations and intent

Accounting for cost and energy inflation

- A key part of the exercise was to source data from RPOs and suppliers who will be operating in Scotland to deliver DRS, but also source other data from other schemes and existing indices to maximise the accuracy and quality of what is used in the calculation. Slide 13 (in the original report) describes the 3 level hierarchy adopted, and the slides following in the 'Datapack' show the actual hierarchy level used for each main parameter.
- The purpose of the hierarchy was to ensure that the datasets used were of the highest accuracy and reliability, given that the RHF was being calculated more than a year before 'go live', and so more than a year before actual data becomes available. Once the scheme is live then subsequent reviews of the RHF will be able to benefit from actual 'Scottish DRS' data. In some cases data based on other similar schemes was used, given it is based on years of experience (instead of trials or estimates). Parameters most affected by this approach were for times to conduct specific stages of the return-handling process (e.g. changing bags).
- But overall data selection must sit within the scope as defined by the regulations. The board reviewed the wording in the regulations in detail and, aligned to the various statements made and intent expressed by Scottish Government, excluded the following parameters:
 - The opportunity cost associated with floor space used for DRS. The regulations clearly state it is the rental value that should be used
 - The cost of building and utility works associated with RVMs. The regulations clearly state that only costs associated with the "purchase, lease, maintenance and upkeep" of RVMs should be included. Discretionary works to create enhanced or additional facilities are not covered by the fee.
- For these reasons some of the data submitted by retailers during the exercise wasn't factored into final decision making. For completeness the data points displayed on the following slides (e.g. average, quartile values) are reflective of all data submitted
- Finally, all submitted data was baselined to a common date, then inflated to Feb 2024 (the mid point of the first year of operation) using ONS estimates available at time of 9.8% for 2022/3 and 5.5% for 2023/4. Electricity prices were inflated separately based on the then estimate of unit cost in 2024 of £0.42/kWh.

Comparing the resulting RHF to other DRS schemes suggests the fee delivers reasonable compensation on average and a stronger 'floor' to protect fairness

Comparison of Scotland Retail RHF to European benchmarks



Addendum information shared November 2022 *Datapack*

Key evidence sources used to inform each input

Each cost inclusion area was underpinned by different sources of data, each sitting at different stages of the evidence hierarchy

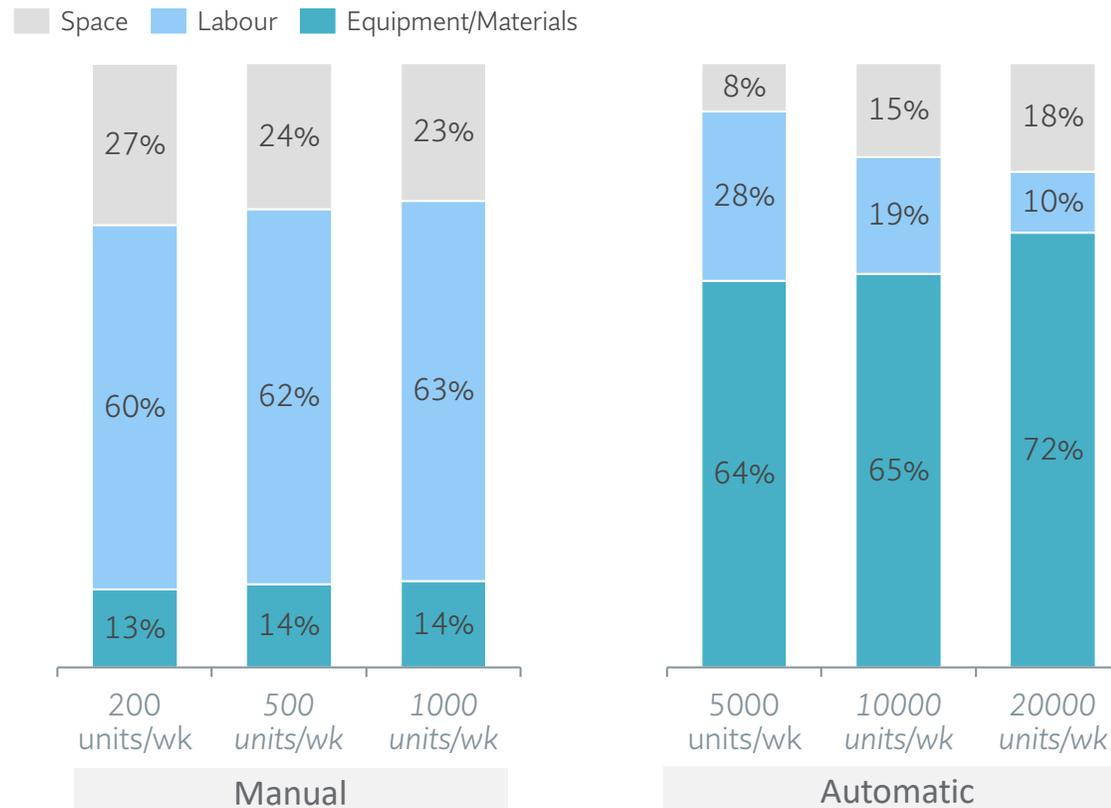
Cost	Sub-cost	Data Source Hierarchy		
		Primary	Secondary	Tertiary
Space costs	Rent estimates	Valuation roll data	RPO data	None available
	Additional space costs (heating, electricity, business rates)	Valuation roll data (for business rates)	RPO data	None available
Labour costs	Fully loaded wage estimates	National minimum and Scottish Living wage data	RPO data	None available
	Time estimates	None available	RPO-conducted studies, International benchmarking, Expert interviews	RPO estimates based on current activity
RVM costs	RVM specifications	CSL specifications	RPO RVM trial data, RVM manufacturer data	Automatic RPO RVM trial data, RPO estimates based on quotes received
	RVM cost estimates	None available		
Material costs	Material specifications	CSL specifications	International benchmarking, Expert interviews	None available
	Material cost estimates			
Transport costs	Delivery cost estimates	None available	Expert interviews	RPO estimates based on current activity
	Delivery volume estimates			
RPO data	RPO site information	CSL data on return point information	None available	RPO estimates based on current activity
	RPO volume estimates			

Based on this hierarchy, data from existing schemes was typically used in favour of best guess estimates or examples from individual return point operators

Data inputs were categorised and fed into Labour, Space and Equipment cost variables which are used to set the RHF

- The relative proportion of these cost categories differs based on RPO type (manual vs automatic) and return volumes
- Hundreds of variables were used as inputs to estimate the RHF. The following slides visualise the selected key inputs for each of the cost categories which are the key drivers of costs
- As would be expected, for the manual RHF labour is the largest cost segment due to the return process being conducted manually, not via a Reverse Vending Machine (RVM)
- For the Automatic RHF, equipment is the largest cost segment, this is primarily driven by the costs associated with purchasing a RVM

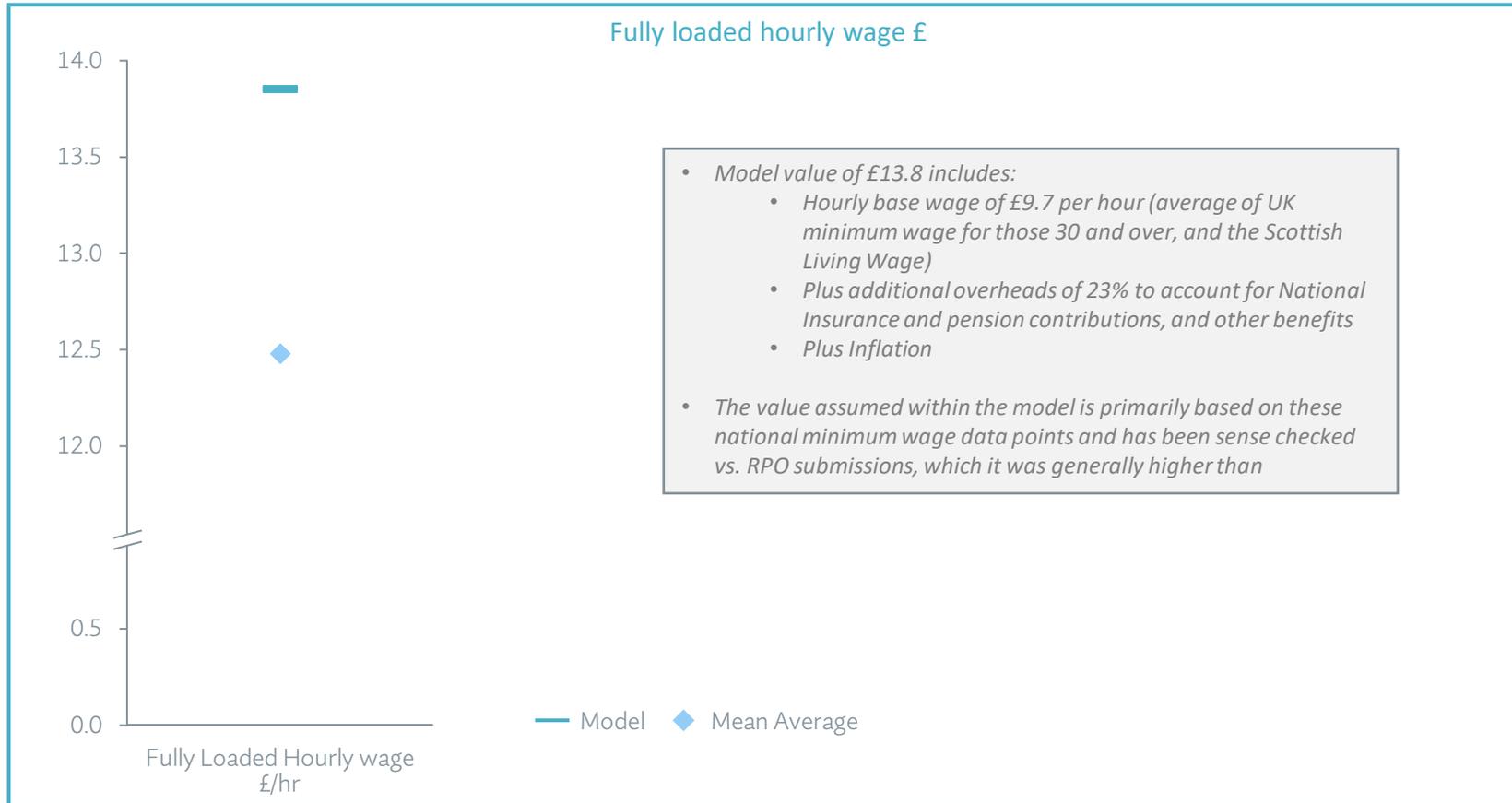
Example breakdown of RHF fee, by cost category for selected return volumes



Comparison of the final data inputs used with the range of data submissions received from industry - Labour (1 of 3)

Key Labour Inputs: c.60% of Manual RHF, c.10-30% of Automatic RHF

Labour Costs – Manual and Automatic

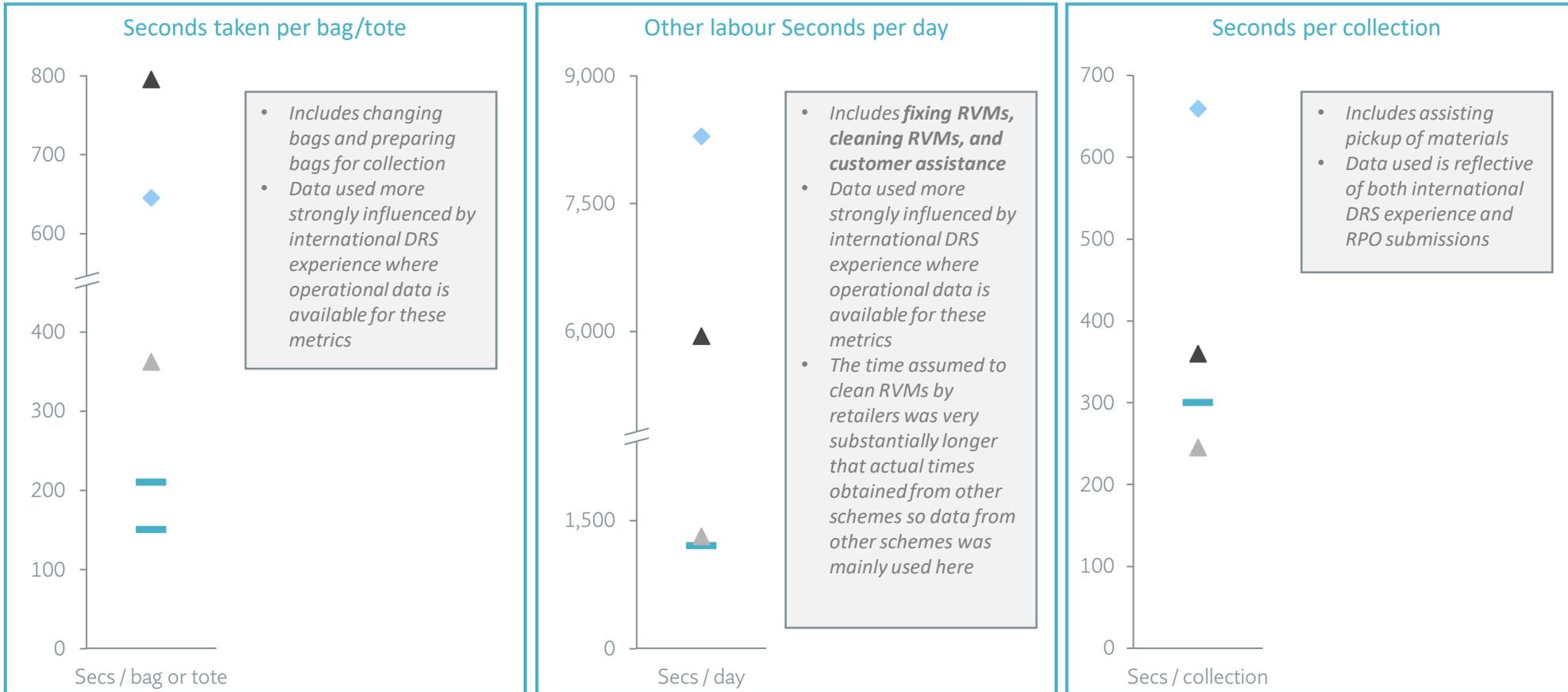


Comparison of the final data inputs used with the range of data submissions received from industry - Labour (2 of 3)

Please note the average submission value is the mean average – e.g. the value of the sum of all submissions divided by the number of submissions. As such, it is in some instances higher than the Upper Quartile value due to outlier submissions from RPOs³

Key Labour Inputs – 10-30% of Automatic RHF

Time Taken – Automatic¹



Model input values were influenced more strongly by the experience of international DRS where live data is available. In many instances these inputs were substantially lower than the working assumptions / best guesses on time taken by Scottish retailers (who for obvious reasons lacked the scale data from months/years of actual operation)

Comparison of the final data inputs used with the range of data submissions received from industry – Labour (3 of 3)

Key Labour Inputs – c.60% of Manual RHF

Time Taken – Manual¹



Please note the average submission value is the mean average – e.g. the value of the sum of all submissions divided by the number of submissions. As such, it is in some instances higher than the Upper Quartile value due to outlier submissions from RPOs³

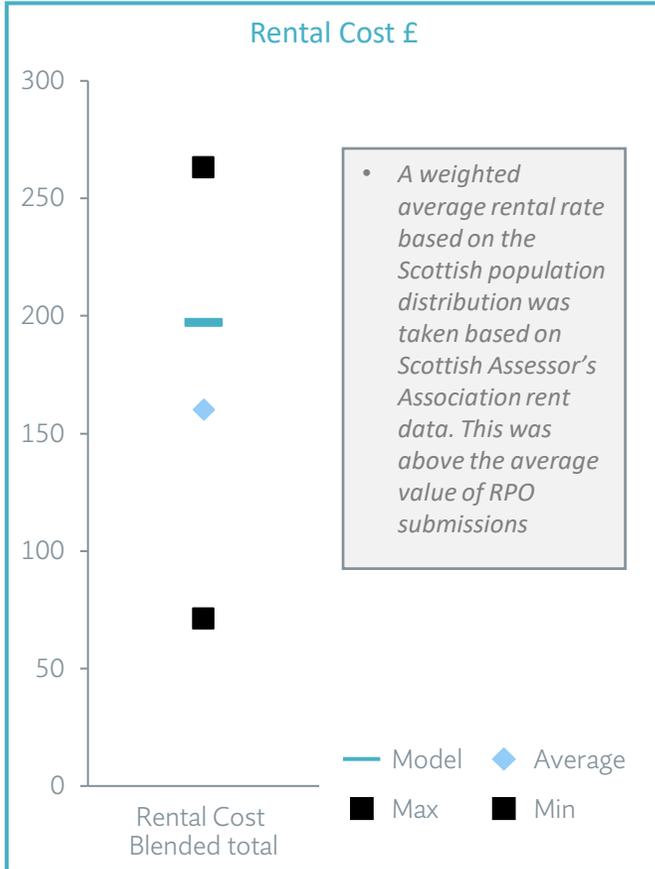
Model input values were influenced more strongly by the experience of international DRS where live data is available. In many instances these inputs were substantially lower than the working assumptions/ best guesses on time taken by Scottish retailers (who for obvious reasons lacked the scale data from months/years of actual operation)

Comparison of the final data inputs used with the range of data submissions received from industry – Space

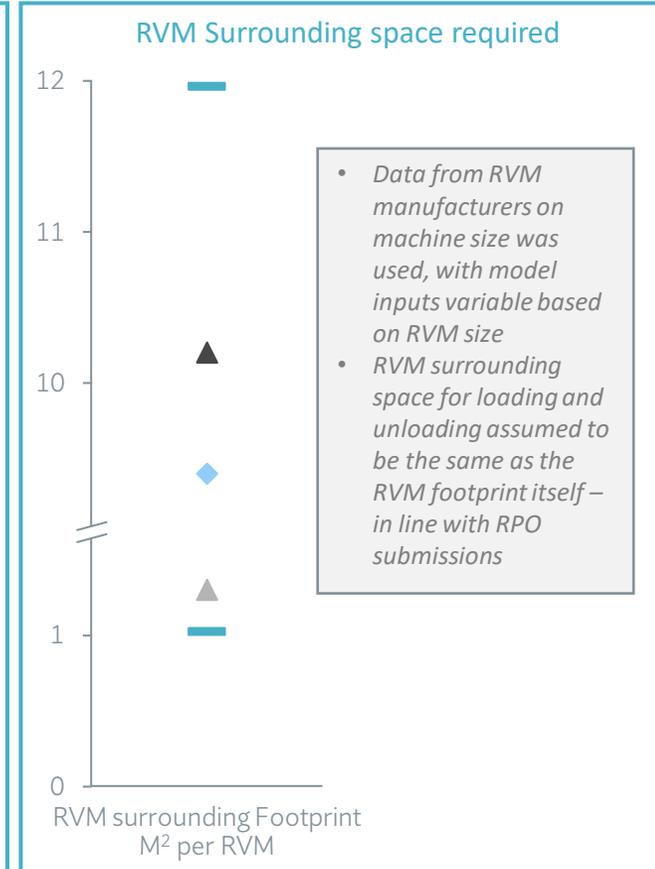
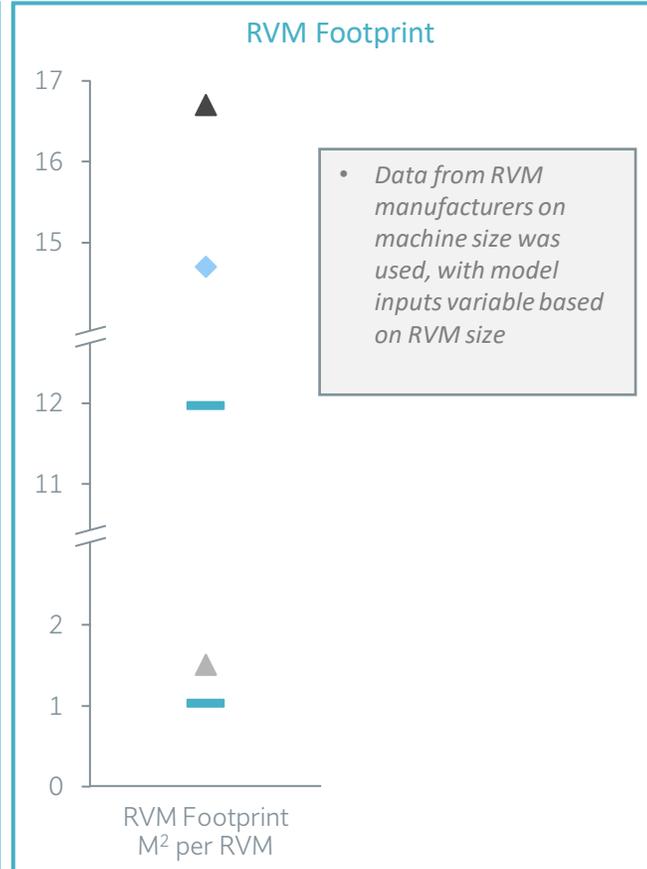
Please note the average submission value is the mean average – e.g. the value of the sum of all submissions divided by the number of submissions. As such, it is in some instances higher than the Upper Quartile value due to outlier submissions from RPOs²

Key Space Inputs: c.25% of Manual RHF, c.10-20% of Automatic RHF

Space Rental Costs – Manual and Automatic



RVM Space - Automatic

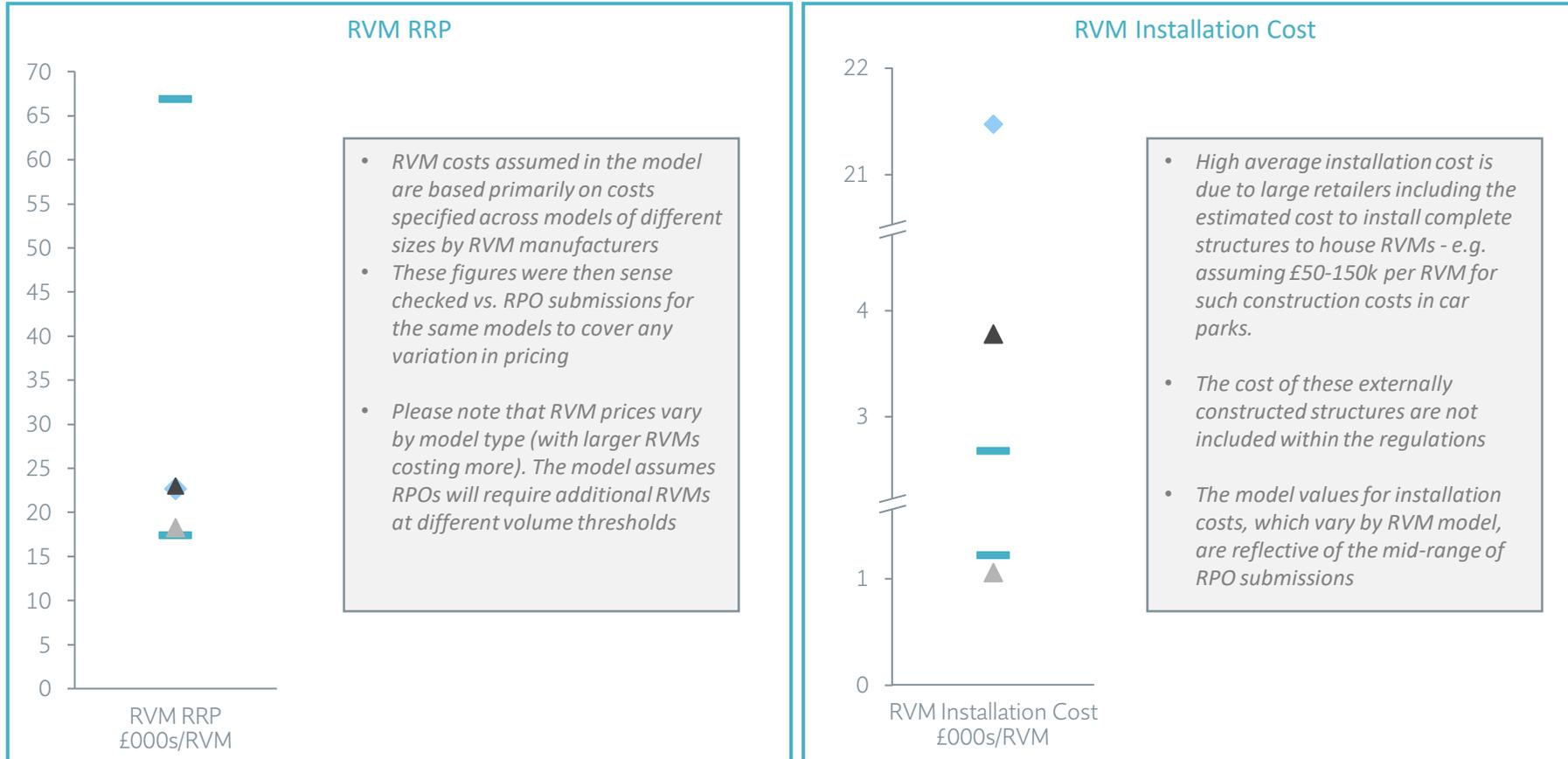


◆ Mean Average — Model min¹ — Model max¹ ▲ Lower Quartile ▲ Upper Quartile

Comparison of the final data inputs used with the range of data submissions received from industry - Equipment

Key Equipment Inputs: c.10-20% of Automatic RHF

RVM Costs - Automatic



Please note the average submission value is the mean average – e.g. the value of the sum of all submissions divided by the number of submissions. As such, it is in some instances higher than the Upper Quartile value due to outlier submissions from RPOs²

- The costs for Bags and Labels for storage are assumed to be:
 - Manual:** 70p per bag and 2p per label, for 152 containers
 - Automatic:** £2 per bag and 2p per label, for 750 containers
- Costs assumed based on prices for similar items in international schemes and other desk research

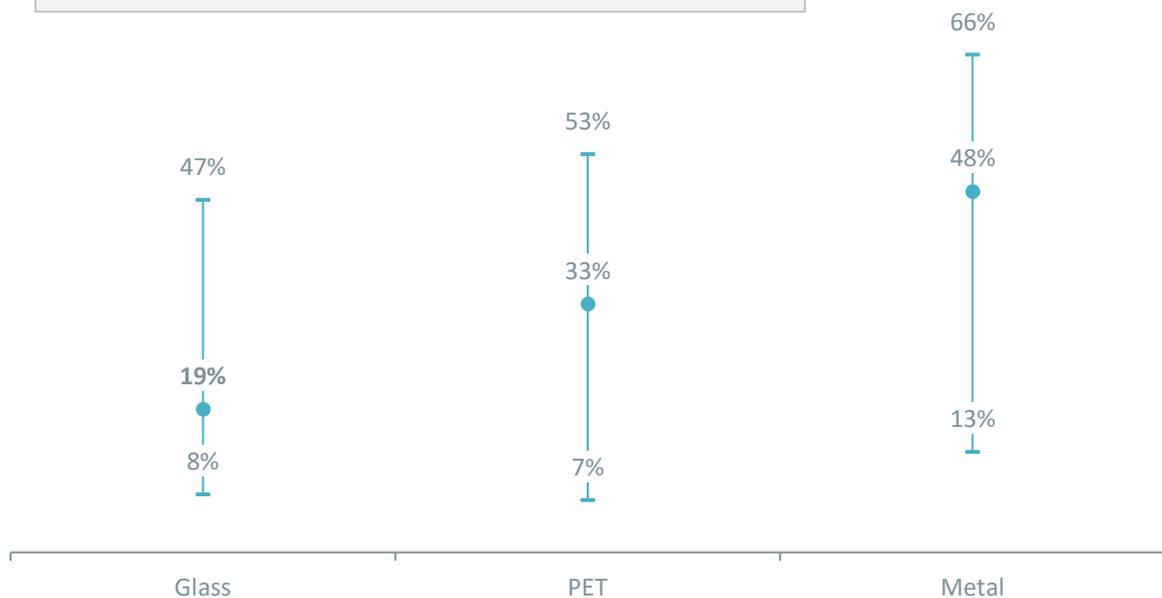
Setting the material mix for an 'average site'

Material mix inputs

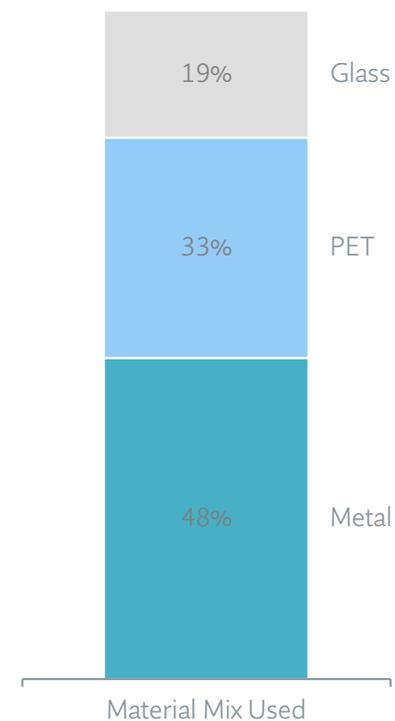
% material sale split

- I Range of material mix among retailers in the submitted RPO data
- Average material mix across the retailer landscape (based upon CSL RPO data)

Material mix varies across types and sizes of stores resulting in the deviation from the average material mix



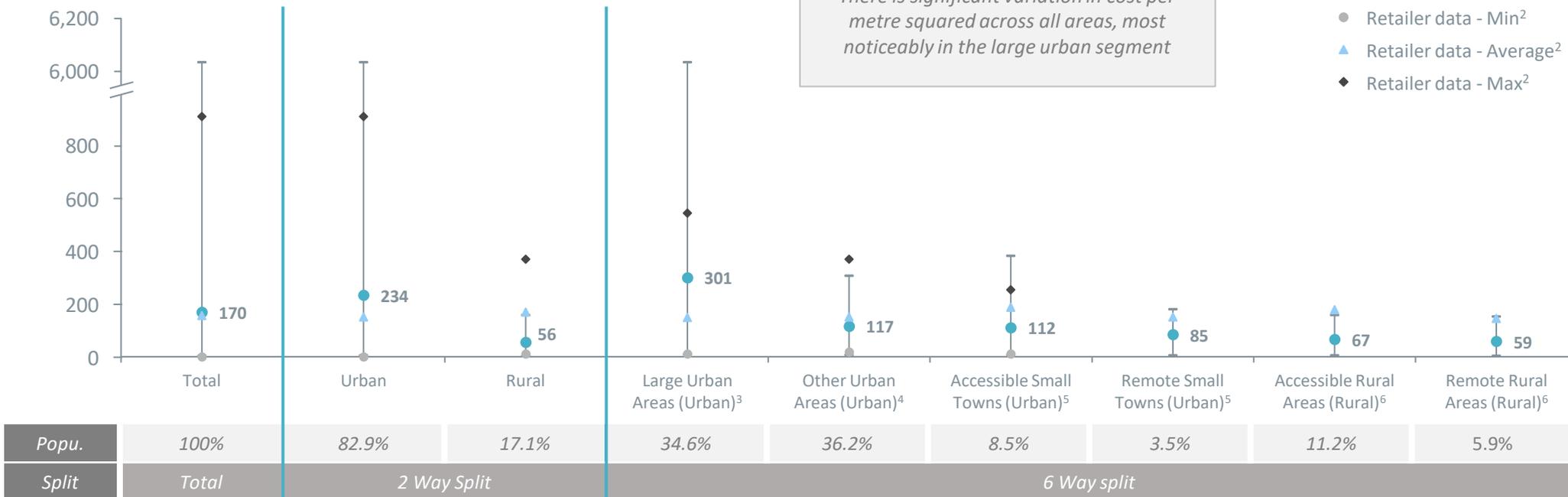
The average material mix value was used to represent an 'average' site



Setting the rental cost for an 'average site'

Rental cost inputs, by location type

£/m²/year



Popu.	100%	82.9%	17.1%	34.6%	36.2%	8.5%	3.5%	11.2%	5.9%	
Split	Total	2 Way Split			6 Way split					

A weighted average total of £170 per m²/year (inflated to £197 per m²/year for 2 years of inflation) was used to represent an 'average' site

Cost curves were modelled to analyse how the volume of returned containers influences fixed and variable costs incurred

Cost Curve logic

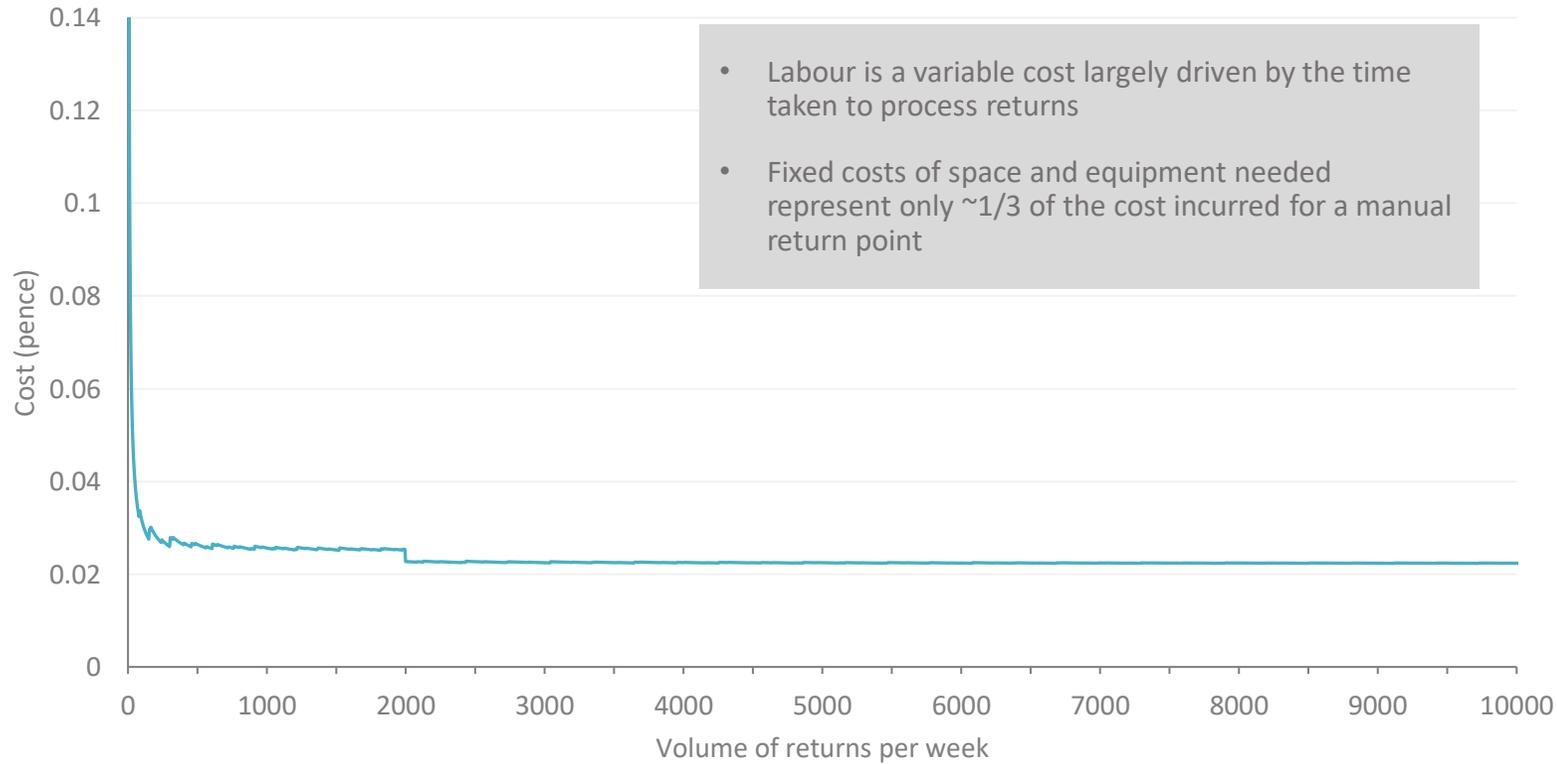
- The RHF is a fee per container – which means that the total fee paid is proportional to the number of containers received
- The costs for an RPO have both fixed and variable elements based on container volume: e.g. RVM costs are fixed, time to receive a container in a manual Return Point (RP) is variable
- The actual cost per container for a RP is $(\text{Fixed} + \text{Variable costs})/\text{Number of containers}$

- RPO costs/container are generally higher for low volumes and lower for higher volumes. Ultimately the fixed cost proportion of a container's cost reduces to a low level at very high volumes of returned containers
- *An example: a RP (which has spent ~£15k on a small RVM) but only collects say 100 containers a week could have actual costs/container significantly higher than the Manual RHF. In the context of comparisons with other schemes and in the development of an efficient scheme a RHF which sought to compensate for such costs would be clearly unreasonable*

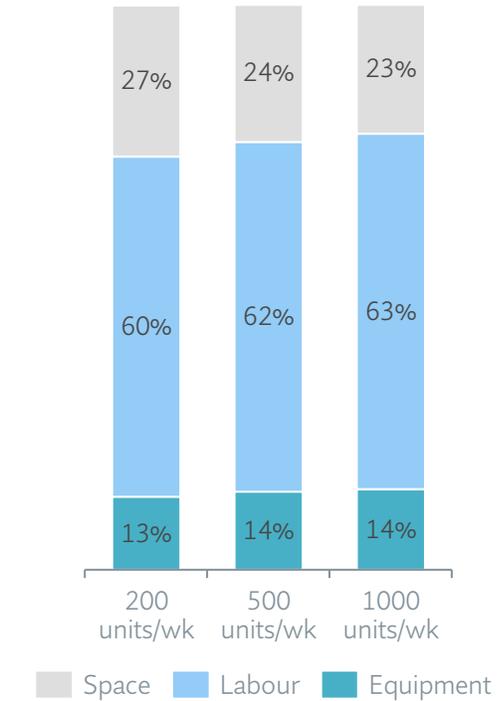
- The cost/container was therefore plotted on a curve showing the cost/container at a range of container volumes up to 100k (based on CSL modelling of likely return volumes and the level at which the curve begins to flatten)
- The curves themselves are representations of the sum of costs at a site for given return volumes. Actual costs at a given site will vary based on factors such as material mix and site location; **the curves represent weighted average sites**

Cost curve – Manual (no RVM)

Manual Cost Curve

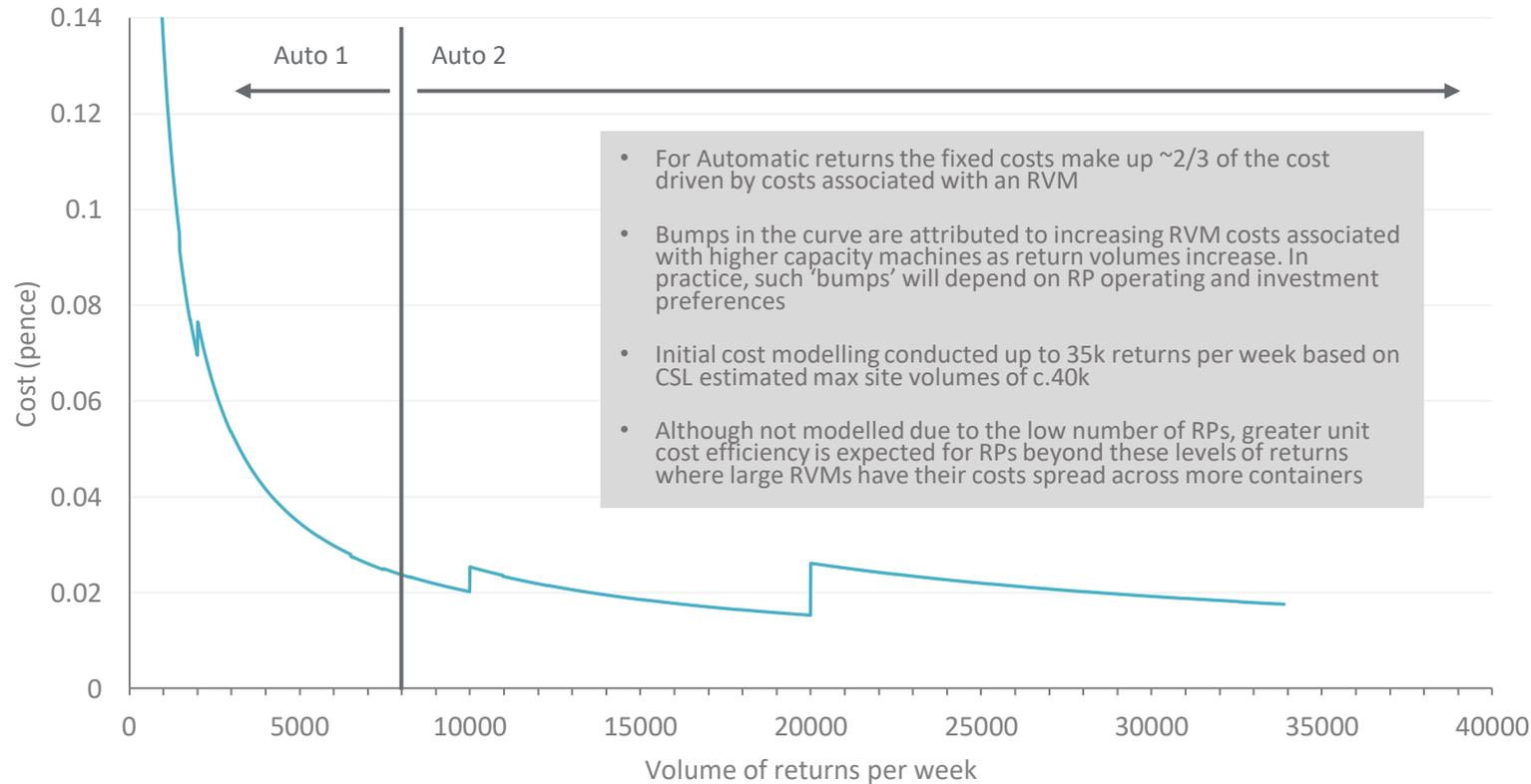


Cost category breakdown

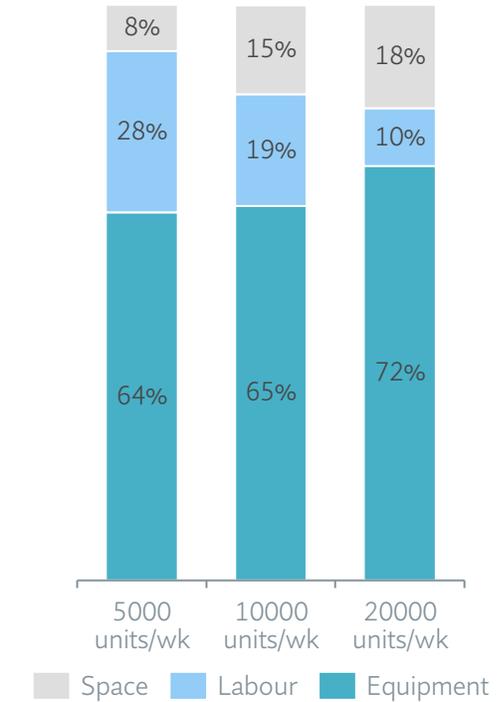


Cost Curve – Automatic (using an RVM)

Automatic Cost Curve



Cost category breakdown



Cost inclusion Details by RHF

The cost curves are underpinned by data gathered across a range of cost areas (as outlined in the original report) with different cost areas included for manual and automatic returns

Cost area inclusion per RHF

	Automatic	Manual	Open-loop Hospitality	Closed-loop Hospitality	Takeback
Storage space for bag/totes	Included	Included	Included	Excluded	Included
Space for RVM	Included	Excluded	Excluded	Excluded	Excluded
Staff time cost	Included	Included	Included	Excluded	Included
RVM purchase & operational costs	Included	Excluded	Excluded	Excluded	Excluded
Materials for storage and collection	Included	Included	Included	Included	Included
Transportation	Excluded	Excluded	Excluded	Excluded	Included

Key: ■ = Included ■ = Excluded

End of Addendum