

Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

About you

1. Would you like your response to be confidential?

Yes / **No**

If you answered 'Yes' above, please give your reason:

2. What is your name? **Ian Finch**

3. What is your email address? ian.finch@sevenoaks.gov.uk

This is optional, but if you enter your email address then you will be able to return to edit your consultation at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation.

4. Please provide information about the organisation/business you represent.

Which of the following best describes you?

(Please tick only one option. If multiple categories apply to you please choose the one which best describes you and which you are representing in your response.) (Required)

- Business representative organisation/trade body
- Product designer
- Manufacturer
- Distributor
- Retailer
- Waste Management Company
- **Local Authority**
- Reprocessor
- Community group
- Charity
- Social enterprise
- Independent consultancy
- Academic or researcher
- Individual
- Other

If you answered 'Other' above, please provide details:

What is the name of the organisation/business you represent? (Required. If you are responding on behalf of yourself please write 'individual')

Sevenoaks District Council – Waste Collection Authority

Appendix C

What is the approximate number of staff in your organisation? (If applicable)

5. Please provide any further information about your organisation or business activities that you think might help us put your answers in context. (Optional)
Member Council of the Kent Resource Partnership.
6. Does your organisation have any recent experience of a DRS or related policy schemes? If so, can you please briefly explain your experiences? **N/A**
7. Are you content for the UK government, or in Wales, the Welsh Government, or in Northern Ireland, DAERA to contact you again in relation to this consultation? **Yes**

Basic principles for a DRS

8. Do you agree with the basic principles for a DRS?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where there are principles you do not agree with, please outline them here. Where available, please share evidence to support your view

All eight principles are important, especially the second principle. It is extremely important that if a well-designed DRS system is implemented, it forms part of a coherent system to improve resource efficiency, alongside producer responsibility obligations and existing kerbside collections.

Proposed models for a DRS system

9. Should the following materials be in scope of a DRS:

- a. PET bottles

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Although supported in principle, PET bottles are collected via Sevenoaks DC's kerbside collections and so a DRS may move

Appendix C

higher-value recyclable materials away from the collection and disposal authorities, which will potentially increase costs of managing these materials and reduce income from material sales.

b. HDPE bottles

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

HDPE bottles (e.g. milk) are collected via Sevenoaks DC's kerbside collections and are not traditionally seen as a 'litter' issue. If there is scope to capture more HDPE bottles, it may be more sensible to boost citizen communications for using existing services.

c. Aluminium cans

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Although supported in principle, Aluminium cans are collected via Sevenoaks DC's kerbside collections and so a DRS may move higher-value recyclable materials away from the collection and disposal authorities, which will potentially increase costs of managing these materials and reduce income from material sales.

d. Steel cans

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Although supported in principle, Steel cans are collected via Sevenoaks DC's kerbside collections and so a DRS may move higher-value recyclable materials away from the collection and disposal authorities, which will potentially increase costs of managing these materials and reduce income from material sales.

e. Glass bottles

Yes

No

Neither

Appendix C

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Although supported in principle, glass bottles are collected via Sevenoaks DC's 'bring bank' network. A DRS will move higher-value colour-separated cullet away from our collections, which will reduce both income from the sale of these materials and increase our costs of managing those materials not returned via a DRS.

As a way of providing Government with supporting evidence, over the past few months the 13 Kent councils forming the Kent Resource Partnership have worked together with Suez, Anthesis, LARAC and Project Integra to develop the Resource And Waste Policy Impact Calculator (RAWPIC) – further details [here](#) for information.

Reflecting on the impact assessment, it was estimated a return rate of 85% for DRS obligated materials. RAWPIC therefore estimated the tonnage of obligated material that the Kent councils were likely to lose from their kerbside services.

Table 1. Kerbside and estate dry recycling and residual waste tonnages pre and post an "All in" DRS with a return rate of 85% within all 12 district councils in Kent.

	Recycling Tonnage			Residual Tonnage				
	Pre DRS	Post DRS	Difference (Tpa & %)	Pre DRS	Post DRS	Difference (Tpa & %)		
Paper & card	57,838	57,838	0	0%	32,276	32,276	0	0%
Cartons	143	143	0	0%	0	0	0	0%
Targeted plastic (bottles and PTT's)	11,528	8,514	-3,015	-26%	26,095	23,186	-2,909	-11%
Plastic Films	0	0	0	0%	22,084	22,084	0	0%
Glass	30,984	14,133	-16,851	-54%	9,176	4,847	-4,329	-47%
Metals	6,566	5,651	-915	-14%	8,687	8,068	-619	-7%
Contamination and non-target materials	9,638	9,638	0	0%	0	0	0	0%
Remaining residual waste	0	0	0	0%	152,213	152,213	0	0%
Total	116,697	95,917	-20,780	-18%	250,530	242,673	-7,857	-3%

*Tonnages input for Tonbridge & Malling Borough Council and Tunbridge Wells Borough Council are based on future projections.

Appendix C

Table 2. Kerbside and estate dry recycling and residual waste tonnages pre and post an “On-the-Go” DRS with a return rate of 85% within all 12 district councils in Kent.

	Recycling Tonnage			Residual Tonnage				
	Pre DRS	Post DRS	Difference (Tpa & %)	Pre DRS	Post DRS	Difference (Tpa & %)		
Paper & card	57,838	57,838	0	0%	32,276	32,276	0	0%
Cartons	143	143	0	0%	0	0	0	0%
Targeted plastic (bottles and PTT's)	11,528	10,499	-1,029	-9%	26,095	25,102	-993	-4%
Plastic Films	0	0	0	0%	22,084	22,084	0	0%
Glass	30,984	23,215	-7,769	-25%	9,176	7,180	-1,996	-22%
Metals	6,566	6,507	-59	-1%	8,687	8,647	-39	0%
Contamination and non-target materials	9,638	9,638	0	0%	0	0	0	0%
Remaining residual waste	0	0	0	0%	152,213	152,213	0	0%
Total	116,697	107,839	-8,858	-8%	250,530	247,501	-3,029	-1%

*Tonnages input for Tonbridge & Malling Borough Council and Tunbridge Wells Borough Council are based on future projections.

Key Considerations (from the tables above)

- For the ‘all in’ scenario there is likely to be a total loss of ~20,800 tonnes (18% reduction) of obligated materials from the dry recycling and a loss of ~7,900 tonnes (3% reduction) of obligated material in the residual waste.
 - For dry recycling, this loss in tonnage mainly comes from the removal of ~16,900 tonnes of glass (54% reduction), with ~3,000 tonnes of targeted plastic (26% reduction) and ~900 tonnes of metals (14% reduction) being lost to the DRS.
 - For residual, the loss in tonnage also mainly comes from the removal of glass with ~4,300 tonnes (47% reduction) being lost, as well as ~2,900 tonnes of targeted plastics (11% reduction) and ~600 tonnes of metals (7% reduction) also being lost to the DRS.
 - For the ‘on-the-go’ scenario there is a significantly smaller tonnage lost to the DRS from the dry recycling and residual services. In dry recycling services there is likely to be a loss of ~8,900 tonnes (8% reduction) of obligated material, and a loss of ~3,000 (1% reduction) of obligated material from residual collection.
 - For dry recycling, this loss in tonnage mainly comes from the removal of ~7,800 tonnes of glass (25% reduction), with ~1,000 tonnes of targeted plastic (9% reduction) and ~60 tonnes of metals (1% reduction) also being lost to the DRS.
 - For residual, the loss in tonnage also mainly comes from the removal of glass, with ~2,000 tonnes (22% reduction) being lost, as well as ~1,000 tonnes of targeted plastic (4% reduction) and ~40 tonnes of metals (<1% reduction) also being lost to the DRS.
 - Metals show a significant decrease in obligated tonnage between the ‘all in’ and ‘on-the-go’ scenarios due to a high amount of metal cans being sold in multipacks and therefore not obligated in the ‘on-the-go’ option.
- f. Other (please specify)

10. Should the following materials be-in scope of a DRS:

a. Cartons e.g. Tetrapack

Yes

No

Appendix C

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

As Tetrapak are not traditionally considered usual litter items, it may therefore be best to capture these products under the reformed UK packaging producer responsibility system.

b. Pouches and sachets, e.g. for energy gels

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

11. If a DRS were to be introduced, should provisions be made so that glass bottles can be re-used for refills, rather than crushed and re-melted into new glass bottles?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

12. Should the following drinks be in-scope of a DRS:

a. Water

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

b. Soft drinks (excluding juices)

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Appendix C

c. Juices (fruit and vegetable)

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

d. Alcoholic drinks

Yes (some)

Yes (all)

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

e. Milk containing drinks

Yes (some)

Yes (all)

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

As for the reasons outlined in Q9b, milk containers may be best to be collected via local authority kerbside collections. There may be also hygiene issues with collecting via a DRS system should the handling/disposal of these materials be infrequent.

f. Plant-based drinks (such as soya, rich almond and oat drinks)

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

As for the reasons outlined in Q9b, soya, rich almond and oat drink containers may be best to be collected via local authority kerbside collections. There may be also hygiene issues with collecting via a DRS system should the handling/disposal of these materials be infrequent.

Appendix C

g. Milk

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

As for the reasons outlined in Q9b, milk containers may be best to be collected via local authority kerbside collections. There may be also health & safety issues with collecting via a DRS system should the handling/disposal of these materials be infrequent.

h. Other (please state which):

13. Do you think disposable cups should be in the scope of a DRS?

a. Disposable cups made from paper with a plastic lining (such as those used for coffee)

Yes

No

Neither

I don't know / I don't have enough information

b. Disposable cups made of plastic (such as those used in vending machines)

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view. The government is particularly interested in any.

In line with the waste hierarchy, the use of disposable cups should be discouraged. Coffee cup recycling is a high-profile waste stream, which is difficult to recycle due to the composite nature and regularly littered. We believe maximum capture of materials should be encouraged and therefore it may be worth considering including these items within an EPR system – this may lead to strong measures brought in to push action on cups recycling.

14. Do you agree with the proposed material flows as described above?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Appendix C

Please briefly state the reasons for your response. Where available, please share evidence to support your view

The material flow shows all the material being returned to the return point/retailer, which then forward this to collection systems. The material which a citizen places in the kerbside collection is not shown in the diagram. It is also unclear what the 'Counting Centre' is e.g. is it a Materials Recycling Facility (MRF) or a new facility?

Expenses are paid to the 'Collection System' and the 'Counting Centre' – what role, if any, does the collection & disposal authority have for kerbside collected materials?

15. Do you agree with the proposed financial flows as described above?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

As referenced in the consultation, Local Authorities would need to be paid for the DRS materials collected, bulked, hauled and disposed of.

Appendix C

Overlap with the packaging producer responsibility system

16. Should producers obligated under a DRS be:

- a. Exempt from obligations under the reformed packaging producer responsibility system for the same packaging items?
- b. Also obligated under the reformed packaging producer responsibility system for the same packaging items?
- c. Other (please explain)
- d. I don't know/I don't have enough information**

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

17. If producers were obligated under both a DRS and a reformed packaging producer responsibility system for the same packaging items, how could we effectively ensure that they would not be unfairly disadvantaged by a 'double charge'? **N/A**

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Deposit Management Organisation (DMO)

18. Do you agree that the DMO should be responsible for meeting high collection targets set by government?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

Having responsibility will provide greater incentive to achieve targets. Dovetailing with our response to the EPR consultation, the single-body (as outlined in model 2) could work with the DMO or be a wider body, which incorporates the DRS system and these responsibilities.

19. Should the DMO also be responsible for meeting high recycling targets set by government?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

Appendix C

20. Should unredeemed deposits be used to part-fund the costs of the DRS system?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

Most of the packaging from the unredeemed deposits will have ended up as litter or disposed/recycled via kerbside collections, bring banks, recycling centres or in the residual waste, falling to councils to manage. It would therefore be appropriate for the funds from the unredeemed deposits to be directed to councils to cover the costs of collecting, reprocessing and disposing of this material. In accordance with the Circular Economy principles, we would also encourage funding be directed towards enhancing local reprocessing facilities.

As a way of providing Government with supporting evidence, over the past few months the 13 Kent councils forming the Kent Resource Partnership have worked together with Suez, Anthesis, LARAC and Project Integra to develop the Resource And Waste Policy Impact Calculator (RAWPIC) – further details [here](#) for information.

The RAWPIC provided Kent councils with an indicative value of unredeemed deposits within kerbside collections by calculating the total number of units of each obligated material that are likely to remain (the material not captured via DRS). Indicative figures are based upon an 85% DRS return rate of obligated materials and potential £0.15 deposit price. A breakdown of unredeemed deposit value by material type for an 'all-in' and 'on-the-go' scenario can be found below: -

Table 3. Obligated tonnage remaining within kerbside collections of all 12 district councils in Kent after an "All in" DRS with an 85% return rate and a £0.15 deposit value, and the associated range of unredeemed deposit values.

Material stream	Remaining DRS obligated tonnage			Total	
	Recycling tonnage	Residual tonnage	Total tonnage	Total unredeemed deposit value (min)	Total unredeemed deposit value (max)
PET Plastic bottles	532	513	1,045	£5,405,850	£6,033,150
HDPE Plastic bottles**	0	0	0	£0	£0
Aluminium cans	149	99	248	£2,490,150	£2,787,300
Steel cans	13	10	23	£0	£0
Glass bottles	2,974	764	3,738	£1,655,100	£2,142,450
Cartons***	0	0	0	£0	£0
Totals	3,667	1,387	5,054	£9,551,100	£10,962,900

*Tonnages input for Tonbridge & Malling Borough Council and Tunbridge Wells Borough Council are based on future projections.

**HDPE plastic bottles show 0's due to 100% of them being associated with the dairy industry which is not in scope for the "All in" scenario.

***Cartons show 0's due to them not being scope for the "All in" scenario.

Appendix C

Table 4. Obligated tonnage remaining within kerbside collections of all 12 district councils in Kent after an “On-the-Go” DRS with an 85% return rate and a £0.15 deposit value, and the associated range of unredeemed deposit values.

Material stream	Remaining DRS obligated tonnage			Total	
	Recycling tonnage	Residual tonnage	Total tonnage	Total unredeemed deposit value (min)	Total unredeemed deposit value (max)
PET Plastic bottles	182	175	357	£1,980,900	£2,195,250
HDPE Plastic bottles**	0	0	0	£0	£0
Aluminium cans	10	7	17	£174,600	£195,450
Steel cans	0	0	0	£0	£0
Glass bottles	1,371	352	1,723	£801,450	£1,111,500
Cartons***	0	0	0	£0	£0
Totals	1,563	534	2,098	£2,956,950	£3,502,200

*Tonnages input for Tonbridge & Malling Borough Council and Tunbridge Wells Borough Council are based on future projections.

**HDPE plastic bottles show 0's due to 100% of them being associated with the dairy industry which is not in scope for the “On-the-Go” scenario.

***Cartons show 0's due to them not being scope for the “On-the-Go” scenario.

Key Considerations (from the tables above)

- The value of unredeemed deposits has been given as a range due to the number of units within a tonne of each material stream being variable.
- For the ‘all-in’ scenario there is ~5,100 tonnes of obligated material remaining within the dry recycling and residual waste collections. This equates to between ~£9.5m and ~£11m of unredeemed deposits.
 - The majority of this unredeemed deposit value comes from PET plastic bottles, with a value of ~£5.4m to ~£6m.
 - Glass bottles have the highest tonnage of obligated material remaining within the kerbside collections (~3,700 tonnes), but due to its high weight, this only equates to an unredeemed deposit value of ~£1.7m to ~£2.1m.
- For the ‘on-the-go’ scenario there is ~2,100 tonnes of obligated material remaining within the dry recycling and residual waste collections. This equates to ~£3m to ~£3.5m of unredeemed deposits.
 - The majority of this unredeemed deposit value comes from PET plastic bottles, with a value of ~£2m to ~£2.2m.
 - Like in the ‘all-in’ scenario, glass bottles have a significantly higher tonnage of obligated material remaining within the kerbside compared to the other material types due to the extra weight, but a relatively lower unredeemed deposit value of ~£0.8m to ~£1.1m.
- Aluminium cans show a significant reduction in tonnage between the ‘all-in’ and ‘on-the-go’ scenarios due to a high amount of metal cans being sold in multipacks and therefore not obligated in the ‘on-the-go’ option.

21. If unredeemed deposits are not used to part-fund the costs of the DRS system, do you agree they should be passed to government?

Yes

No

Neither

I don't know / I don't have enough information

Appendix C

Please briefly state the reasons for your response. Where available, please share evidence to support your view

Unredeemed deposits could be spent into maximising kerbside or disposal infrastructure, communications campaigns and the reprocessing infrastructure. This would be a good example of the principle of full cost recovery aspect of EPR as outlined in the recent EU Circular economy package. This could contribute to reducing the burden on producers to put funds into Local Authorities through other EPR mechanisms proposed.

Please see our answer to Q20 for supporting evidence.

22. Do you have alternative suggestions for where unredeemed deposits could be allocated?

As mentioned above, unredeemed deposits could be allocated to support infrastructure requirements. Also communications campaigns which promote recycling and reduce litter into the environment.

Please see our answer to Q20 for supporting evidence.

23. If the scheme is managed by the DMO, which of the following bodies should be represented on the management board:

- a. Industry (drinks producers)?
- b. Government
- c. Trade associations representing those hosting return points (e.g. retailers, small shops, transport hubs)?
- d. Companies representing those hosting return points (e.g. retailers, small shops, transport hubs)?
- e. Other (please specify)

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

If a DRS scheme is managed by a DMO, it would be sensible to include the bodies noted above on the management board. It may also be worth considering others across the supply chain too e.g. Local Authorities, Waste Management companies, Reprocessors etc.

24. Should there be government involvement in the set-up/running of the DMO body?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Appendix C

25. Do you agree with the government's proposals that a DMO would:

- a. Advise government on the setting of the deposit level/s

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

- b. Set producer/importer fees

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

- c. Be responsible for tracking deposits and financial flow in the DRS – and ensuring those running return points are paid the deposits they refund to consumers

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

- d. Set and distribute the handling fees for return points

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

- e. Be responsible for ensuring that there are appropriate return provisions for drinks containers in place, and that these are accessible?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

- f. Be responsible for maintenance of reverse vending machines (RVMs) and provision of bags/containers to those running manual return points

Yes

No

I neither agree nor disagree

Appendix C

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

- g. Own the material returned by consumers

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

- h. Reimburse those transporting returned drinks containers to recyclers/counting/sorting centres – and manage these contracts

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

- i. Fund counting sorting/centres – and manage the contracts for counting/sorting centres

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

- j. Be legally responsible for meeting the high collection targets set by government for drinks containers within scope of the DRS.

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

- k. Measure and report recycling rates to government

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

Appendix C

- I. Run communications campaigns to aid consumer understanding of the DRS

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

If a DRS system was put in place, it may be worth considering national communications which dovetail with WRAP's Recycle Now campaign.

Producers

26. Do you agree with our proposed definition of a producer?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

27. Should there be a de minimis which must be crossed for producers and importers of drinks in-scope of a DRS to be obligated to join the scheme?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Fairness

28. Should a de minimis be based on:

- a. Number of employees
 - i. If yes, how many employees?
- b. Sales figures
 - ii. If yes, what figure?
- c. Volume/weight of drinks put on the market
 - iii. If yes, what volume/weight?
- d. None of these
- e. **Other – N/A**

Appendix C

29. If there is a buy back scheme for recycled materials, do you have evidence for how this could be effectively run? N/A

30. In line with the principle of full net cost recovery, the government proposes that producers would cover the set up costs of the DMO? Do you agree with this proposal?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

31. Should the DMO be responsible for co-ordinating the set-up of the DRS, including buying RVMs and an IT system?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

Operational costs

32. Should producers of drinks within a DRS be responsible for DRS operational costs?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

Retailers / return provisions

33. Which of the following should be obligated to host a return point?

- a. Retailers who sell drinks containers in scope
- b. Transport hubs
- c. Leisure centres
- d. Event venues
- e. None of these
- f. Other (please specify)

Please briefly state the reasons for your response. Where available, please share

Appendix C

evidence to support your view

34. What might the impacts be on those hosting:

(a) Reverse vending machines? Where available, please share evidence to support your view. **Vandalism of the machine to either access deposited material or money if the machines provide payments. The incentive for retailers to host such a scheme could be questioned as there would be a requirement to invest in space, labour and administration. Whilst these costs are likely to be recovered from the DMO, surely retailers will be seeking a financial return?**

(b) Manual return points? Where available, please share evidence to support your view. **Counter error and would probably have to be counted again to be verified electronically in another location.**

35. Are there any Health and Safety-specific implications that may be associated with hosting return points?

Especially with regards to milk, soya, rich almond and oat drink containers for the hygiene reasons mentioned earlier on with our consultation response. Other issues may include storage of containers and impact of retail space.

36. Is there a de minimis level under which businesses who sell drinks in scope should be exempt?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

Smaller businesses or those with limited opening hours could be exempt to minimise the collection costs of materials, which is likely to be low. This however has to be balanced against providing a comprehensive collection network in rural areas. Also please refer to our answer at Q34.

37. Should a de minimis be based on:

- a. **Floor size**
 - i. If yes, what floor size? E.g. food vans which are mobile
- c. Sales figures for drinks in scope
 - ii. If yes, what figure?
- d. Number of employees
 - iii. If yes, how many employees?
- e. None of these
- f. Other (please specify)

Appendix C

38. Please briefly state the reasons for your response. Where available, please share evidence to support your view
Please refer to our answer at Q34.

39. Do you have alternative suggestions for return provisions that could be used to accept the return of drinks containers? Please provide details.

40. For consumers who would have difficulty returning empty drinks containers, what provisions could be put in place so that these consumers are able to return drinks containers and receive their deposit refund? If 'on-the-go' is targeted, these items would have been purchased whilst out so transport providers could support returns at different locations on their transport network, subject to our observations under Q35.

41. What provisions could be put in place for rural areas where there may be few small retail outlets spread over a wider area, in order to ensure that there are adequate return and collection facilities? Please refer to our answer at Q34.

42. Do you have evidence that would help inform us about whether there is potential for siting RVMs outdoors e.g. in parks, at existing outdoor recycling centres, on highstreets?

Collection Authority bring bank site space is very limited. From a Waste Disposal Authority perspective, there would be insufficient capacity at Household Waste Recycling Centres (HWRCs).

43. Should online retailers selling drinks in in-scope containers be obligated to pick up and refund DRS material?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where possible, please provide supporting information.

This would be dependent on the packaging to be included with the DRS system. If the system is to target 'on-the-go' items only, the inclusion of online retailers may be inappropriate. This also links into whether multipacks should be included.

44. Should there be a de minimis under which online retailers would not be obligated to pick up and refund DRS material?

Yes

No

Neither

I don't know / I don't have enough information

Appendix C

If yes, should a de minimis for online retailers be based on:

- a. Sales figures for drinks in scope
- b. Number of employees
- c. None of these
- d. Other (please specify)

45. Should certain businesses which sell drinks in in-scope drinks containers host return points, e.g. pubs, hotels, cafes? Please provide details.

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where possible, please provide supporting information.

If the aim of the DRS system is to maximise the capture of 'on-the-go' items, it may wish to consider including pubs, hotels and cafes as items would be purchased on site and enable citizens an opportunity to redeem their deposit easily.

46. Should there be an opportunity for retailers that don't stock drinks / those who may not be obligated to provide a return point to 'opt-in'?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where possible, please provide supporting information.

Please refer to our answer at Q34.

47. Do you have any further views, comments or evidence in relation to retailers not already covered above?

On-trade Sales

should think we should consider.

48. How should a DRS account for 'on-trade' sites such as bars and restaurants **Please refer to our answer at Q45.**

The deposit

49. What do you consider to be the optimum deposit level to incentivise return of drinks containers?

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Appendix C

Further research is required on this. The value needs to be high enough so that it can drive the desired behaviour change, without significant adverse impact on the commercial viability of the item or disproportionate impact on any social group.

50. Should the deposit level be a flat rate across all drinks containers covered by the DRS?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

If a DRS scheme is implemented, it needs to be simple and easy for citizens to do the right thing. A single price will allow for a consistent message with less chance of ambiguity and minimise administration.

51. Should there be an alternative deposit level for drinks containers in a multipack, rather than each container carrying the same deposit?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

This approach could cause confusion to citizens.

52. How do you think deposits should be redeemed? Please tick all that apply.

- a. Voucher (for deposit value, printed by the reverse vending machine or by the retail assistant at manual drop-off points)
- b. Digitally (for example a digital transfer to a smartphone application)
- c. Cash
- d. Return to debit card
- e. Option to donate deposit to charity
- f. Other (please state)
- g. None of the above

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

All options noted above seem sensible. It should be the choice of the citizen how they wish to redeem their deposit, rather than dictated by a retailer.

Another option could include a loyalty card – this could incentivise retailers as it would

Appendix C

encourage citizens to continue shopping in stores. A slight caution with having cash as an option could be the practical difficulties, which could lead to theft /damage to the machines.

Appendix C

Sending material on for recycling and data recording

53. Should the DMO be responsible for ensuring that there is evidence that drinks containers have been recycled?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

54. In addition to reporting on collection rates, should the DMO also be obliged to report on recycling rates of in-scope drinks containers?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Transparency

55. How do you think transparent financial flows in a DRS could be achieved most effectively?

Please explain your answer, providing evidence where available.

Monitoring and enforcement

The DMO

56. Would Environment Agencies in England, Wales and Northern Ireland be best placed to monitor/enforce a DRS covering England, Wales and Northern Ireland?

If no, why and is there another body that would be better suited to perform this function?

Yes

No

Neither

I don't know / I don't have enough information Please explain your answer

Funded from the system to enable robust enforcement. Not just from an environmental perspective but also financial probity too. There needs to be the right practical incentives to secure a robust network in the first instance.

57. How frequently should the DMO be monitored?

(This monitoring would look at, i.e., financial accounts, material flows, proof of recycling rates, setting of deposit level (if done by the DMO))

- a. **Annually**
- b. Bi-annually
- Other (please specify)

Annually in the first instance. EA then may wish to use its own discretion, based upon all its environmental priorities.

58. How often should producers be checked for compliance with the DRS (if compliance is obligated)?

- a. **Annually**
- b. Bi-annually
- Other (please specify)

59. Should enforcement focus on:

- a. A sample of producers?
- b. **All producers? (Initially for 1 to 2 years to ensure operations are smooth – then could transition to a sample of producers)**

60. Should any penalties (fines) on the DMO or producers/importers be set by the regulator appointed to monitor the DMO?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share

Appendix C

evidence to support your view.

Fraud

61. Are there any points in the system which you think would be particularly susceptible to fraud? Please state

Yes. There could be issues of fraud as items within a DRS system are moved across borders. There also may be labelling issues too.

Any credit/payment system gives an opportunity for money laundering.

62. Which labelling/markings on drinks containers in scope would best protect against fraud?

Please select all that apply:

- a. Deposit value amount
- b. Marking indicating inclusion in DRS
- c. Existing product barcode (containing DRS information when scanned)
- d. Other (please specify)
- e. None of the above

Please explain your answer. We are particularly interested in evidence of effective fraud prevention in existing DRS systems.

From this aspect, comparisons with other countries is likely to be relevant and likely to be directly transferable. Labelling can serve two purposes – citizen information and then audit trail/repayment. OPRL could fulfil the citizen information aspect and the audit trail/repayment element would appear to suit inclusion in bar code type labelling. It is noted that high security labels would minimise fraud, the additional costs of using high security labels would need to be fully evaluated to demonstrate if it is a cost effective control.

63. How could return via reverse vending machines (RVMs) best be protected against fraud? We are particularly interested in any evidence you may have to support suggestions. Non cash payments may be considered as there is a form of traceability.

64. How could the process of manual returns best be protected against fraud? We are particularly interested in any evidence you may have to support suggestions.

65. How could a DRS best protect against fraud across Devolved Administrations in the event of similar schemes with common underlying principles (but not one uniform scheme)? Ideally one uniform scheme would help eliminate some elements of fraud.

DRS Options – ‘all-in’ and ‘on-the-go’

Appendix C

'All-in' option

66. Should drinks containers over a certain size, for example beer kegs and containers used for water coolers, be excluded from an all-in DRS?

Yes

No

Neither

I don't know/I don't have enough information

Please state the reasons for your response. Where available, please share evidence to support your view

Not littered and already well collected by breweries and water suppliers.

67. If drinks containers over a certain size were excluded from an all-in DRS, what should the maximum cut-off size be?

> 3 Litres

> 4 Litres

> 5 Litres

Other

There should be no maximum size cut-off

Please state the reasons for your response. Where available, please share evidence to support your view

Under 3 litres is most likely size of containers.

'On-the-go' option

68. Do you agree with our definition of 'on-the-go' as less than 750mls in size?

Yes

No

Neither

I don't know/I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

69. Do you agree with our definition of 'on-the-go' as excluding multipack containers?

Yes

No

Neither

I don't know/ I don't have enough information

Please briefly state the reasons for your response, including in which cases multipack containers should not be excluded from our definition of 'on-the-go'. Where available, please share evidence to support your view

Appendix C

Multipack containers may be purchased and returned to home. They may then used on-the-go. An example of this is for packed lunches.

70. Based on the information above, and where relevant with reference to the associated costs and benefits outlined in our impact assessment (summarised below), which is your preferred DRS option?

- All-in
- On-the-go
- Neither
- I don't know / I don't have enough information**

Please state the reasons for your response. Where available, please share evidence to support your view

We believe further research data and information would be helpful and there would be merit to focussing on successfully delivering EPR and consistency before exploring a DRS option. But to summarise findings from the Kent councils RAWPIC report, please find below –

For an “All in” DRS there would be ~37,700 tonnes of obligated material within the kerbside and ~950 tonnes of obligated material within HWRCs. Should the DRS perform with an 85% return rate as described within the impact assessment, this could lead to ~28,700 tonnes of obligated material being removed from the kerbside and ~800 tonnes from HWRCs. This loss of material could lead to a potential reduction in net treatment and disposal cost of ~£1.4m for Kent County Council¹.

For an “On-the-Go” DRS there would be ~14,000 tonnes of obligated material within the kerbside and ~400 tonnes of obligated material within HWRCs. Should the DRS perform with an 85% return rate as described within the impact assessment, this could lead to ~11,900 tonnes of obligated material being removed from the kerbside and ~350 tonnes from HWRCs. This loss of material could lead to a potentially reduction in net treatment and disposal cost of ~£0.6m for Kent County Council¹.

From the analysis within RAWPIC, the introduction of either DRS scenario does not suggest that any councils have the possibility to remove any vehicles as a result of the removal of material from their collection rounds.

The RAWPIC analysis also reflects potential impacts to councils recycling performance. The possible implementation of a DRS would remove dry recyclables from the kerbside and could potentially cause an impact on the household recycling rate of councils in Kent. This impact could be significant as the materials that are currently highly targeted and recycled by councils through kerbside collections are the ‘easier to recycle materials’ e.g. plastic bottles, drinks cans etc. The table below estimates how the household recycling rates of the 12 Kent district councils could change, should an ‘all-in’ or ‘on-the-go’ DRS be implemented:-

¹ Calculated using a combination of default values within RAWPIC and average haulage costs provided by Kent County Council. These costs don’t include any consideration of recycling credits.

Appendix C

Table 5. Expected change in household recycling rates in the 12 district authorities in Kent when the materials captured and recycled from an "All in" and "On-the-Go" DRS are removed from kerbside collections are not considered as part of their recycling rate.

Local Authority	Current household recycling rate 2017/18	Recycling rate after an "All in" DRS	Recycling rate after an "On-the-Go" DRS
Ashford Borough Council	56.6%	51.8%	54.6%
Canterbury City Council	43.5%	38.7%	41.5%
Dartford Borough Council	25.2%	22.4%	24.0%
Dover District Council	47.3%	41.6%	44.8%
Folkestone and Hythe District Council	45.3%	40.1%	43.1%
Gravesend Borough Council	40.7%	39.7%	40.5%
Maidstone Borough Council	51.1%	46.9%	49.3%
Sevenoaks District Council	38.1%	35.2%	36.8%
Swale Borough Council	41.2%	36.9%	39.5%
Thanet District Council	34.9%	31.0%	33.2%
Tonbridge and Malling Borough Council*	48.0%	43.9%	46.3%
Tunbridge Wells Borough Council**	48.4%	44.3%	46.6%

*Tonnages and recycling rates input in RAWPIC for Tonbridge & Malling Borough Council are based on future projections.

**Tonnages input into RAWPIC for Tunbridge Wells Borough Council are based on future projections.

There could be a situation where overall the tonnage capture increases across Kent (via existing collections systems and a DRS), but would show household recycling rates fall for councils. We would be keen to find a fair way to reflect performance accurately, without underdoing a lot of positive work councils have achieved by recycling over many years.

Appendix C

Summary of approach to Impact Assessment

71. Do you agree with our impact assessment?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

On page 31, the IA notes the following –

'The proposed DRS system in the consultation suggests that the unredeemed deposits, held by the DMO, will be passed to Government....funds could be invested to deliver a net benefit to society'

The estimated figure for unredeemed deposits noted on page 31 is just over £535 million. Further clarity and explanation may be needed to better understand where this cash will go and what it will be used to deliver principles of a well-designed DRS system, including how cash could flow to Local Authorities.

A broader question is if it is estimated £535 million is captured via unredeemed deposits, where are these items going if not collected via DRS – e.g. is it expected some DRS items could still be littered?

72. Do you think more data is needed? If yes, please state where.

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

Government may wish to consider trials or large scale pilots before implementing a DRS system more broadly.

The UK seem to be in a unique situation in that citizens have a well-established recycling collection at the kerbside and now wish to consider the introduction of a well-designed DRS system. In countries, which currently implement a high performing DRS system – e.g. Norway, Netherlands –, they introduced a DRS system ahead of developing kerbside recycling collections. Therefore the UK would need to consider what the potential impacts could be to citizens given they have been so used to having a recycling service which offers such convenience. The desired changes of behaviours for citizens may need to be picked up in any trials or large scale pilots, should they be taken forward.

Appendix C

One of the key reasons cited for implementing a DRS is that it could reduce littering. Across the industry there seems to be consensus that currently there is limited robust data available to support (or otherwise) this position. This may also be an area where further data is required.

73. Are there other costs and benefits which we have not covered in our impact assessment?

As a high level impact assessment, it seems appropriate. The costs burdens/benefits for local authorities don't seem to be split according to the collection and disposal services, which would be useful later down the line.

74. Do you have further comments on our impact assessment? Please be specific. N/A

75. The dual objectives of a DRS are to reduce litter and increase recycling. Do you wish to suggest an alternative model that would be more effective at achieving these objectives? If so please briefly describe it, making reference to any available evidence

Funding for DRS systems could alternatively spent to maximise capture via councils recycling collection services – as outlined in our response to the EPR consultation, this could include focus on infrastructure needs and consistency in communications as key examples.

76. A potential option for introducing a DRS could be to start with the ‘on-the-go’ model, and then expand/phase roll-out to ‘all-in’. Do you think this would be an effective way to introduce a DRS?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view

Further research would be required, as outlined within our answer to Q72.

Outcomes of what we are hoping to achieve

77. Do you think a DRS would help us to achieve these outcomes? Please briefly state the reasons for your response. Where possible, please share evidence to support your view:

- a. Reduction in litter and litter disamenity (include expected % decrease where possible)

Yes

No

Neither

I don't know / I don't have enough information - Further research required as noted in answer to Q72.

- b. More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go'

Yes

No

Neither

I don't know / I don't have enough information - Further research required as noted in answer to Q72.

- c. Higher quality recycling

Yes

No

Neither

I don't know / I don't have enough information - Further research required as noted in answer to Q72.

- d. Greater domestic reprocessing capacity through providing a stable and high-quality supply of recyclable waste materials

Yes

No

I don't know / I don't have enough information - Further research required as noted in answer to Q72.

78. Do you think a DRS, as set out in this consultation, is necessary in helping us achieve the outcomes outlined above?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information - Further research required as noted in answer to Q72.

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Appendix C

Alternative approaches

79. Do you think the outcomes of what we are hoping to achieve could be reached through an alternative approach?

Yes

No

I neither agree nor disagree

Other (please state)

I don't know / I don't have enough information

Please explain your answer, providing evidence where available.

In principle, the reforms to EPR should provide full net cost recovering allowing great investment in key areas – including to Local Authorities – as well as potentially deliver the same benefits.

Please see our response to Q75.

80. Do you think an alternative approach would be a better way of achieving the outcomes?

Yes

No

I neither agree nor disagree

Other (please state)

I don't know / I don't have enough information

Please explain your answer, providing evidence where available.

Please see our response to Q79.

Statutory local authority recycling targets in Wales

81. Are there particular local authority considerations that should be taken into account when considering whether to implement either an “all-in” or “on-the-go” model?

82. Are there specific considerations associated with your local authority that DRS policy makers should consider?

(Specific examples and any cost estimates, where applicable, would add value to this response).

83. What benefits and/or disadvantages can a DRS provide to your local authority?

(Specific examples and any cost estimates, where applicable, would add value to this response).

Appendix C

84. Are there any specific considerations associated with local authorities that collect waste from designated DRS return points that we should consider?

(Specific examples and any cost estimates, where applicable, would add value to this response).

Design of drinks containers

85. How should a DRS drive better design of packaging? Please select all that apply:

- a. Varying producer fees that reflect the environmental cost of the products that producers are placing on the market
- b. An additional producer fee for producers using unnecessary and/or difficult to recycle packaging
- c. Other (please specify)
- d. None of the above

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Improvement in packaging design may be incentivised as part of EPR but in drafting the regulations consideration should be given as to whether there is scope for producers to reduce the impact on them by manipulating the system.

86. Who should be involved in informing and advising on the environmental cost of products? Select all that apply

- a. Government
- b. Reprocessors
- c. Producers
- d. Local Authorities
- e. Waste management companies
- f. Other (please specify) – including environmental consultancies

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Appendix C

DRS and other waste legislation

87. Do you agree or disagree with our assessment of other waste legislation that may need to be reviewed and amended?

Agree

Disagree

Neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

88. Do you have evidence to suggest that we might need to revise any other waste-related regulations as part of introducing a DRS? Please specify.

Further comments

In addition to this consultation, we are also carrying out social research with the public and other analytical research to support our evidence base for decision making.

89. Is there anything else we should be considering related to drinks container recycling and litter reduction which has not been covered by other questions?